

Delivered by Courier
HCH-015-03

August 11, 2003

Mr. William Norton, Executive Officer/ Air Pollution Control Officer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attn: Ms. Brenda Cabral
Permit Services Division

Re: Valero Refining Company - California
Benicia Asphalt Plant (Plant No. B3193)
Comments on Draft Title V Permit

Dear Ms. Cabral:

Enclosed are Valero's comments on the proposed Major Facility Review ("Title V") Permit for Valero Refining's Benicia Asphalt Plant (Application No. 17468, Plant No. B3193). Our comments are based on a review of the draft Title V permit which was released by the District on June 27, 2003 for a 45-day public comment period and concurrent EPA review. Valero understands that this public comment period closes on August 11, 2003.

Valero appreciates the District's consideration of the written comments submitted to the District on September 6, 2002. Valero has conducted a similar, comprehensive review of this latest draft of the Title V permit and is submitting additional comments to further improve the quality and accuracy of the draft permit. Valero's comments on the draft permit are provided in seven sections (Attachments A through G) to facilitate the District's review and analysis. In addition, Valero has reviewed the Statement of Basis for the draft permit and included comments to the Basis in Attachment A.

Most of Valero's comments are given in Attachments A and B. These attachments are organized as "rationale" tables which provide a line-by-line explanation of each proposed change. Many of the proposed changes are administrative in nature,

including corrections to typographical errors, corrections to ensure consistency of regulatory requirements between Section IV (Applicable Requirements), Section VI (Permit Conditions), Section VII (Monitoring Requirements) and Section IX (Permit Shield), changes to federal enforceability of District regulations including Regulation 8 Rule 5 and Regulation 9 Rule 10. Valero has also identified several substantive changes to the draft permit as discussed below:

- Western States Petroleum Association (WSPA), a petroleum industry trade association of which Valero Refining is a member, has submitted major concerns about proposed new permit conditions for each facility which formalize the District's April 10, 2003 revisions to the June 23, 2000 guidance document concerning "NO_x, CO, and O₂ Monitoring Compliance with Regulation 9 Rule 10" (i.e., the "NO_x box"). Valero specifically endorses and submits the WSPA comments on its own behalf as well. WSPA's comment to the District's proposed permit conditions are included in Attachment E. Valero's comments specific to the District's proposed Conditions #19329 and #20617 in the Asphalt Plant permit are given in Attachment F. Both Attachments E and F should be reviewed concurrently to better understand our concerns with the proposed NO_x permit conditions.
- The Light Gas Oil (LGO) Stripper, S-32, no longer exists and has been physically removed from the Asphalt Plant. Therefore, all references to S-32 have been deleted from the draft permit, as described in Attachments A and B.
- Valero recommends that the originally-proposed language for Condition # 1240, Part I.16a, specifying process conditions for conducting a semi-annual source test on S-19 vacuum heater be retained at the "highest duty possible for the prevailing process conditions". As now proposed, the draft language requires that the source test be conducted at "a minimum of 85% of the maximum capacity of 40 MMBtu/hr (34 to 40 MMBtu/hr)". Since the process duty for this heater is normally about 30 MMBtu/hr, it will be operationally difficult and inefficient to adjust process conditions and substantially increase fired duty for the sole purpose of conducting the semi-annual source tests.
- Valero has proposed changing the term "refinery" to "asphalt plant" many times throughout the permit to clearly distinguish the Valero Asphalt Plant from the Valero Refinery. This proposed change is especially important to clarify that Condition # 1240 Part III.3, refers to the fuel gas system at the asphalt plant rather than the fuel gas system at the main refinery.

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- Finally, ownership of the four crude tanks at the Asphalt Plant has been transferred from Valero Refining Company - California to Valero Logistics Operations, L.P. ("Valero Logistics or Valero LP"). Valero understands that the District intends to issue to Valero Logistics Operations a new, independent Permit to Operate and Title V permit for these tanks and that these same tanks will be concurrently deleted from the Permit to Operate and Title V permit for the Asphalt Plant.

Valero appreciates the opportunity to comment on the draft Title V permit for the Valero Benicia Asphalt Plant for the mutual benefit of the public, government agencies and Valero. If you have any questions on Valero's comments, please contact Mr. Eric R. Hengst, Principal Environmental Engineer, at (707) 745-7385.

Sincerely,

VALERO REFINING COMPANY - CALIFORNIA

Clark Hopper

Environmental Manager, Benicia Refinery

Attachments

cc (w/o attachments): Mr. Steve Hill - Permit Services, BAAQMD
cc (w/ attachments): Mr. Eric Hengst - Valero

Mr. William Norton, BAAQMD

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bcc (w/attachments): K. S. Bellanca

Environmental File 8.2.039

Attachment A

Comments on Sections II, III, IV, VI, VIII, and IX

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
1.	Cover Page	N/A	N/A		Change Responsible Official to: Doug Comeau Title and phone number are not changed	Change to reflect name of new Valero Benicia Refinery and Asphalt Plant manager
2.	IIA	S16	None		Change Description to “Truck Loading Racks – Heavy Vacuum Gas Oil”	Correct name and clarify function of source
3.	IIA	S19	None		Change Description to “Vacuum Heater (natural gas, Asphalt Plant fuel gas)”	To distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery fuel gas systems
4.	<i>IIA</i>	<i>S20, S21</i>	<i>None</i>		<i>Change Capacity to “15 MMbtu/hr</i>	<i>Correspond to capacity listed in BAAQMD proposed NOx Box permit conditions</i>
5.	<i>IIA</i>	<i>S32</i>	<i>None</i>		<i>Delete S32</i>	<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>
6.	IIB	A1	None		Add “(F-8)” to Description. Delete S65 from Sources Controlled. Add S25 and S66 to Sources Controlled	Correct errors and omissions and to make consistent with Section VI
7.	IIB	A3	None		Add S70 to Sources Controlled Put parentheses around “F-10”.	Correct errors and omissions and to make consistent with Section VI
8.	IIB	A4, A31, S19, S24	BAAQMD Condition #1240, Part I.14		Change 49.1 tons per year to 49.345 tons per year	Change to reflect change in permit condition

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
9.	IIB	A4			Add the following: Sources Controlled: S17 Applicable Requirement: BAAQMD 6-301 Operating Parameters: Temperature Limit or Efficiency: Ringelmann No. 1 for no more than 3 minutes in any hour Sources Controlled: S17 Applicable Requirement: BAAQMD 6-310 Operating Parameters: Temperature Limit or Efficiency: 0.15 gr/dscf	Correct omission. Make Table IIB agree with Section VII.
10.	IIB	A4	BAAQMD 8-6-301		Delete S17 from Sources Controlled	This citation is not applicable to S17 and is not in the Table IV for S17.
11.	IIB	A20	None		Delete S66 from Sources Controlled Add S70 to Sources Controlled	Correct errors and omissions and to make consistent with Section VI
12.	IIB	A21	40 CFR 61.349(a)(2)(i)	Did not delete (2) in description column for this carbon canister or change "canisters" to canister" as requested by Valero in June 2002 comments	Delete "(2)" from description column and change "canisters" to "canister".	A21 is only one carbon canister. Correct error.
13.	IIB	A22	40 CFR 61.349(a)(2)(i)	Did not change "canisters" to canister" as requested by Valero in June 2002 comments	Change "canisters" to "canister".	A22 is only one carbon canister. Correct error.
14.	IIB	A23	40 CFR 61.349(a)(1)(i)	Did not incorporate change to applicable requirement as requested by Valero in June 2002. Should be 40 CFR 61.349(a)(2)(ii) rather than 40 CFR 61.349(a)(1)(ii).	Change Applicable Requirement to 40 CFR 61.349(a)(2)(ii)	Correct error.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
15.	IIB	A31	40 CFR 60.472(c) 40 CFR 60.473(c)	Did not change all references from 40 CFR 60.472(c) to the abatement device citation 40 CFR 60.473(c) as requested by Valero	Consolidate all rows for 40 CFR 60.473(c) and 40 CFR 60.472(c) into one row as follows: Sources Controlled: S5-8, S37, S38, S51-53, S60-62, S65, S70 Applicable Requirement: 40 CFR 60.473(c) Operating Parameter: Temperature Limit or Efficiency: 0 percent opacity except for one consecutive 15-min period in any 24-hr period for cleaning. Delete all other rows with Applicable Requirement 40 CFR 60.473(c) or 40 CFR 60.472(c)	Consolidate sources with same requirement and correct errors.
16.	IIB	A31	BAAQMD 8-6-301 (Sources controlled: S54)		Delete row for BAAQMD 8-6-301 for Sources Controlled: S54	S54 is not subject to 8-6-301 in Section IV. Correct error.
17.	IIB	A31	BAAQMD 8-8-307		Change Applicable Requirement to "BAAQMD 8-8-307.2" Change Operating Parameter to "Temperature"	To correspond to citation of limit in Table VII-Z for S41. Correct errors

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
18.	IIB	A31			<p>Add the following:</p> <p>Sources Controlled: S5-8, S31, S37, S38, S51-54, S60-62, S65, S70</p> <p>Applicable Requirement: BAAQMD 6-301</p> <p>Operating Parameters: Temperature Limit or Efficiency: Ringelmann No. 1 for no more than 3 minutes in any hour</p> <p>Sources Controlled: S5-8, S31, S37, S38, S51-54, S60-62, S65, S70</p> <p>Applicable Requirement: BAAQMD 6-310</p> <p>Operating Parameters: Temperature Limit or Efficiency: 0.15 gr/dscf</p>	Correct omission. Make Table IIB agree with Section VII.
19.	IIB	A31, S24			<p>Add the following:</p> <p>Sources Controlled: S66</p> <p>Applicable Requirement: BAAQMD 8-8-301.3</p> <p>Operating Parameters: Temperature Limit or Efficiency: 95% combined collection and destruction efficiency</p>	Correct omission. Make Table IIB agree with Section VII.
20.	IIB	A31, S24	40 CFR 61.349(a)(2)(i)(A)		<p>Consolidate all rows for 40 CFR 61.349(a)(2)(i)(A) into one row as follows:</p> <p>Sources Controlled: S12, S25-S28, S41, S66, S67</p> <p>Applicable Requirement: 40 CFR 61.349(a)(2)(i)(A)</p> <p>Operating Parameter: Temperature Limit or Efficiency: 95% control of inlet VOC</p> <p>Delete all other rows with Applicable Requirement 40 CFR 61.349(a)(2)(i)(A)</p>	Consolidate sources with same requirement. Add sources S26 and S27 to reflect new applicability added to Section IV.

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
21.	IIB	A31, S24	BAAQMD 8-5-311.3		Change requirement to 8-5-306	Correction for current version of BAAQMD 8-5. 8-5-311.3 was a citation in the former version of BAAQMD 8-5 but does not exist in current version.
22.	IIB	A31, S24	BAAQMD Condition # 1240 Parts II.43 II.55 II.32a II.69 (A31 only) II.56 II.70 II.32b II.57 II.32c II.85		Consolidate permit conditions with Limit or Efficiency of 98.5% destruction as shown on Attachment C Source(s) Controlled: [See Attachment C] Applicable Requirement: BAAQMD Condition #1240, Part [see Attachment C] Operating Parameters: Temperature Limit or Efficiency: 98.5% destruction	Consolidate applicable requirements and sources with same limit or efficiency. Add Part II.70 for S54 to S24 Add Part II.57 for S61, S62 to A31 (correct omissions)
23.	<i>IIB</i>	<i>A44</i>			<i>Delete S32 from Sources Controlled</i>	<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>
24.	IIB	S19	N/A		Change Description to “Vacuum Heater (natural gas, Asphalt Plant fuel gas)”	Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery fuel gas systems
25.	<i>IIB</i>	<i>S19</i>	<i>BAAQMD Condition #1240, Part I.14</i>		<i>Delete S32 from Sources Controlled</i>	<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>
26.	<i>IIB</i>	<i>S19</i>	<i>40 CFR 63.643(a)(2)</i>			<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>
27.	IIB	S24	BAAQMD Condition #1240, Part I.14		Delete A6 from Sources Controlled and add S54 to Sources Controlled	Correct errors and omissions

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
28.	IIB	S24			<p>Add the following:</p> <p>Sources Controlled: S5-8, S37, S38, S51-54, S60-62, S65, S70</p> <p>Applicable Requirement: BAAQMD 6-301</p> <p>Operating Parameters: Temperature Limit or Efficiency: Ringelmann No. 1 for no more than 3 minutes in any hour</p> <p>Sources Controlled: S5-8, S37, S38, S51-54, S60-62, S65, S70</p> <p>Applicable Requirement: BAAQMD 6-310</p> <p>Operating Parameters: Temperature Limit or Efficiency: 0.15 gr/dscf</p>	Correct omission. Make Table IIB agree with Section VII.
29.	IIB	S24			<p>Add the following:</p> <p>Sources Controlled: S41</p> <p>Applicable Requirements BAAQMD 8-8-307.2</p> <p>Operating Parameter: Temperature Limit or Efficiency: 70% combined collection and destruction efficiency</p>	To correspond to citation of limit in Table VII-Z for S41. Correct omission
30.	IIB	S24	40 CFR 60.473(c)		<p>Consolidate all rows for 40 CFR 60.473(c) into one row as follows:</p> <p>Sources Controlled: S5-8, S37, S38, S51-53, S60-62, S65, S70</p> <p>Applicable Requirement: 40 CFR 60.473(c)</p> <p>Operating Parameter: Temperature Limit or Efficiency: 0 percent opacity except for one consecutive 15-min period in any 24-hr period for cleaning.</p> <p>Delete all other rows with Applicable Requirement 40 CFR 60.473(c)</p>	Consolidate sources with same requirement.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
31.	III		SIP Regulation 4		Change date to 8/6/90	Correct error
32.	III		BAAQMD Regulation 6	Did not incorporate request in June 2002 markup to change FE to “Y”	Change Federal Enforceability to “Y”	Current version of Regulation 6 is SIP approved
33.	III		BAAQMD Regulation 8, Rule 4		Change date to 10/16/2002	Incorporate correct date of revised BAAQMD rule. Correct error
34.	III		EPA Regulation 40 CFR 82		Add Subpart H, 40 CFR 82.270(b) Prohibitions, Halon with Federally Enforceable (Y/N) of “Y”	Asphalt Plant has halon for fire fighting applications and is subject to this regulation. Correct omission
35.	IV-A	All Sources	BAAQMD Regulation 8, Rule 5, all citations		Change Federally Enforceable (Y/N) to “Y” for all citations	Current version of BAAQMD 8-5 is SIP approved.
36.	IV-A	All Sources	8-5-328	Did not change description from “cleaning” to “degassing”	Change description from “cleaning” to “degassing”	Citation in current version of regulation says “degassing”, not “cleaning” and other related citation descriptions have descriptions of “degassing” rather than “cleaning”
37.	IV-A	All Sources	8-5-404.3	Did not delete citation as requested	Delete citation	Citation does not exist in current version of BAAQMD 8-5.
38.	IV-A	All Sources	8-5-602	Did not add citation as requested	Add 8-5-602 Analysis of Samples; True Vapor Pressure	Citation is applicable to all sources and should be added to this table. It may be necessary to take TVP samples from tanks other than those tanks listed in the individual tank tables.
39.	IV-A	All Sources	8-5-604	Did not add citation as requested	Add 8-5-604 Determination of applicability	Citation is applicable to all sources and should be added to this table. It may be necessary to determine applicability of tanks other than those tanks listed in the individual tank tables.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
40.	IV-A	All Sources	SIP Regulation 8, Rule 5, all citations		Delete this regulation and all citations	Current version of BAAQMD 8-5 is SIP approved, therefore, separate SIP citations no longer apply.
41.	IV-A	All Sources	BAAQMD Regulation 8, Rule 28		Add date of 3/18/98	Correct omission
42.	IV- A	All Sources	SIP Regulation 8, Rule 28 8-28-302		Delete SIP Regulation 8, Rule 28 and citation 8-28-302.	This citation does not exist in the current SIP version of 8-28.
43.	IV-A	All Sources	40 CFR 61 Subpart FF		Add the following citations: 61.340(d) 61.342(a) 61.342(g) 61.348(a) 61.348(a)(5) 61.348(b) 61.350(a) 61.350(b) 61.355(a) 61.355(a)(1) 61.355(a)(2) 61.355(a)(3) 61.355(a)(6) 61.355(b) 61.355(b)(1) 61.355(b)(7) 61.355(c)(1) 61.355(c)(1)(i) 61.355(c)(1)(i)(A) 61.355(c)(1)(ii) 61.355(c)(1)(iii) 61.355(c)(1)(iv) 61.355(c)(1)(v)	Add applicable citations from 40 CFR 61 Subpart FF Benzene Waste Operations

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
44.	IV-A	All Sources	40 CFR 61 Subpart FF		Add the following citations: 61.355(c)(2) 61.355(c)(3) 61.355(k)(1) 61.355(k)(2) 61.355(k)(3) 61.355(k)(5) 61.355(k)(6) 61.356(b)(4) 61.357(a)(1) 61.357(a)(2) 61.357(a)(3) 61.357(d)(2) 61.357(d)(5) 61.357(d)(6) 61.357(d)(7) 61.357(d)(7)(iv) 61.357(d)(7)(iv)(A) 61.357(d)(7)(iv)(C) 61.357(d)(7)(iv)(G) 61.357(d)(7)(iv)(I) 61.357(d)(8)	Add applicable citations from 40 CFR 61 Subpart FF Benzene Waste Operations
45.	IV-A	All Sources	40 CFR 61 Subpart FF		Delete the following citations: 61.345(a)(2) 61.356(d) through 61.356(j) 61.357(e) 61.357(f)	Delete non-applicable citations and delete citations that are included in the individual equipment tables from 40 CFR 61 Subpart FF Benzene Waste Operations
46.	IV-A	All Sources	40 CFR 63 Subpart A		Make changes to 40 CFR 63 Subpart A citations as shown on Attachment D	Incorporate recent revisions to 40 CFR 63 Subpart A.
47.	IV-A	All Sources	BAAQMD Condition 1240, Part I.15		Change “refinery” to “Asphalt Plant”	Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
48.	IV-A	All Sources	BAAQMD Condition 1240, parts I.18	Did not add Parts I.18a and I.18j, NMHC and NOX calculations as stated in the Statement of Basis, Page 11	Change Part I.18 in Applicable Requirement to Part I.18a, and Add Part I.18j, Summary of emissions estimates and reports of non-compliance (Cumulative Increase), Y.	Correct omission.
49.	IV-B-G, P-S, Y, Z, AB, AD-AG, AI, AL, AP	Tanks and associated abatement devices	All BAAQMD 8-5 citations		Change Federally Enforceable (Y/N) to “Y”	Current version of BAAQMD 8-5 is SIP approved and all citations are federally enforceable.
50.	IV-B-G, P-S, Y, Z, AB, AD-AG, AI, AL, AP	Tanks and associated abatement devices	SIP Regulation 8, Rule 5		Delete SIP Regulation 8, Rule 5 and all related citations. Delete all footnotes related to SIP unless another SIP applies to the table.	Current version of BAAQMD 8-5 is SIP approved and all SIP citations should be deleted.
51.	IV-B	S1, S2, S4, S23	BAAQMD 8-5	Did not add the subparagraph of 8-5-320.3 as requested.	Add the following citation: 8-5-320.3.1	In this case, it is not appropriate only to add the rolled up citation (8-5-320.3) because one of the subparagraphs (8-5-320.3.2) is not applicable to external floating roof tanks. Where only some of the subparagraphs are applicable, then those subparagraphs need to be listed together with the rolled up citation.
52.	IV-B	S1, S2, S4, S23	BAAQMD 8-5 (8-5-321.2)	Did not correct paragraph number in description column as requested.	Correct paragraph number in the description column to “8-5-305.1.3”	Correct error

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
53.	IV-B	S1, S2, S4, S23	BAAQMD 8-5	Did not delete the following citation as requested: 8-5-322.3	Delete the following citation: 8-5-322.3	Citation is not applicable to the external floating roof tanks at the Asphalt Plant because they are required to have zero-gap secondary seals in accordance with permit condition II.12. This permit condition makes the tanks subject to the more stringent requirements of 8-5-322.5 rather than to the requirements of 8-5-322.3.
54.	IV-B	S1, S2, S4, S23	BAAQMD 8-5	Did not delete the following citations as requested: 8-5-502 8-5-601 8-5-602 8-5-604 8-5-603 8-5-603.1.2	Delete the following citations: 8-5-502 8-5-601 8-5-602 8-5-604 8-5-603 8-5-603.1.2	8-5-502 calls for the annual source test for the tank degassing equipment and is applicable on a site-wide basis (and is in Table IV-A). 8-5-601 calls for Reid Vapor Pressure analysis. This analysis is not applicable to the Valero Asphalt Plant crude storage tanks. 8-5-602 and 8-5-604 are applicable site-wide and should be added to Table IV-A. They are not included in other source-specific tank tables (IV-E). 8-5-603 and all subparagraphs are source tests and are not applicable to the floating roof tanks in Table IV-B. 8-5-603.1.2 was a citation in the previous version of 8-5 and has been deleted.
55.	IV-B	S1, S2, S4, S23	40 CFR 60 Subpart Kb		Add the following citations: 60.113b(b)(1)(i) 60.113b(b)(1)(ii)	Add missing citations for NSPS Kb primary and secondary seal gap measurement frequencies

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
56.	IV-B	S1, S2, S4, S23	40 CFR 63 Subpart CC		Add the following citations: 63.640(c)(2) 63.640(n)(8)	Complete applicability path for NSPS Kb EFR tanks
57.	IV-B, E	S1, S2, S4, S23, S9	40 CFR 60 Subpart Kb		Add the following citations: 60.116b(e)(2) 60.116b(e)(2)(i) 60.116b(e)(2)(ii)	Add citations for determining true vapor pressure for crude oil and refined petroleum products because tanks contain crude oil (IV-B) and refined petroleum products (IV-E).
58.	IV-B, E	S1, S2, S4, S23, S9	40 CFR 60 Subpart Kb		Delete the following citations: 60.116b(e)(3)(i) 60.116b(e)(3)(ii) 60.116b(e)(3)(iii)	Delete citations for determining true vapor pressure for other liquids because tanks are subject to 60.116b(e)(2) for crude oil and refined petroleum products instead of these citations.
59.	IV-B, E	S1, S2, S4, S23, S9	BAAQMD 8-5	Did not delete the following citations as requested: 8-5-111.4 8-5-320.5 (and in IV-E, 8-5-320.5 subparagraphs) 8-5-320.6	Delete the following citations: 8-5-111.4 8-5-320.5 and all subparagraphs 8-5-320.6	Floating roof tanks are not equipped with vapor recovery systems, therefore, 8-5-111.4 is not applicable. Floating roof tanks at the Asphalt Plant have only solid fixed projections and are not subject to the requirements of 8-5-320.5. Floating roof tanks at the Asphalt Plant do not have emergency roof drains and are not subject to the requirements of 8-5-320.6.
60.	IV-B, E, G, AD, AF	S1, S2, S4, S23, S9, S13, S59, S63	BAAQMD 8-5 (8-5-328)	Did not change description from “cleaning” to “degassing” as requested	Change description from “cleaning” to “degassing”	Correct to agree with current regulatory language. Citation in current version of regulation says “degassing”, not “cleaning”
61.	IV-B, E, G, AD, AF	S1, S2, S4, S23, S9, S13, S59, S63	BAAQMD 8-5	Did not add new 8-5-328.1 (Tank degassing requirements; Tanks > 75 cubic meters) as requested	Add the following Citation with FE of “Y”: 8-5-328.1 Tank degassing requirements; Tanks > 75 cubic meters	Citation is applicable to sources and should be added

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
62.	IV-B, E, G, AD, AF	S1, S2, S4, S23, S9, S13, S59, S63	BAAQMD 8-5 (8-5-328.1.2)		Change description from “Concentration of <10,000 ppm as methane after cleaning” to read “Organic concentration in tank <10,000 ppm as methane after degassing”	Clarifies that the concentration of organics is the limit and changes “cleaning” to “degassing” to match current regulation wording
63.	IV-C, D, AB, AE, AG	S3, S5-8, S37, S38, S51-53, S60, S61, S62, S65	40 CFR 63 Subpart CC		Delete the following citations: 63.646(b)(1) 63.646(b)(2) 63.654(i)(1) 63.654(i)(1)(iv) 63.654(i)(4)	These tanks are existing MACT Group 1 and Group 2 tanks that are also subject to NSPS Kb. In accordance with 40 CFR 63 Subpart CC, these tanks are subject only to NSPS Kb therefore, these MACT recordkeeping requirements do not apply.
64.	IV-C, D, AB, AE, AG	S3, S5-8, S37, S38, S51-53, S60, S61, S62, S65	40 CFR 63 Subpart CC		Add the following citations with FE of “Y”: 63.640(c)(2) Applicability and Designation of Storage Vessels 63.640(n)(1) Applicability and Designation of Affected Source Overlap for Storage Vessels--Existing Group 1 or Group 2 also subject to Kb only subject to Kb. 63.640(n)(8) Applicability and Designation of Affected Source Overlap for Storage Vessels--Additional requirements for Kb storage vessels	Complete applicability path for NSPS Kb fixed roof tanks

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
65.	IV-C, D, AB, AE, AG	S3, S5-8, S37, S38, S51-53, S60, S61, S62, S65	40 CFR 60 Subpart Kb		<p>Add header row for: 40 CFR 60 Subpart Kb NSPS for Volatile Organic Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984. and Add the following citations with FE of “Y”:</p> <p>60.110b(a) Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984</p> <p>60.110b(c) Applicability and Designation of Affected Facility; Exemptions for storage vessels > or = to 75 cu m</p> <p>60.116b(a) Monitoring of Operations; Record retention</p> <p>60.116b(b) Monitoring of Operations; Permanent record requirements</p> <p>60.116b(g) Monitoring of Operations; Exemption from 116b(c) and 116b(d)</p>	Add 40 CFR 60 Subpart Kb NSPS for Volatile Organic Storage Vessels and applicable citations to show the recordkeeping only applicability path for these NSPS Kb fixed roof tanks with closed vent systems and control devices.
66.	IV-D, AB, AE, AG, AL	S5-8, S37, S38, S51-53, S60-62, S65, S70	BAAQMD Condition 1240, Parts II.58b	Did not document changes to permit condition callout in Section IV in the Statement of Basis for these sources.	Modify Statement of Basis	Correct omission.
67.	IV-D, AB, AE, AG, AL	S5-8, S37, S38, S51-53, S60-62, S65, S70	BAAQMD Condition 1240, Parts II.58c II.58d II.58e		Delete listed permit conditions from the controlled sources (asphalt tanks).	These permit conditions are related to temperature excursions in the abatement devices (S24 and A31). They apply only to the abatement devices and not the controlled sources.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
68.	IV-E	S9	BAAQMD 8-5	Did not add the following subparagraphs of 8-5-305 as requested: 8-5-305.2, 8-5-305.3, 8-5-305.4, and 8-5-305.	Add the following citations: 8-5-305.2, 8-5-305.3, 8-5-305.4, and 8-5-305.	In this case, it is not appropriate only to add the rolled up citation (8-5-305) because one of the subparagraphs (8-5-305.1) does not apply to this source. Where only some of the subparagraphs are applicable, then those subparagraphs need to be listed together with the rolled up citation.
69.	IV-E	S9	BAAQMD 8-5	Did not delete the following citations as requested: 8-5-320.2.1, 8-5-320.2.2, 8-5-320.2.3	Delete the following citations: 8-5-320.2.1, 8-5-320.2.2, and 8-5-320.2.3	Citations do not exist in current version of BAAQMD 8-5.
70.	IV-E	S9	BAAQMD 8-5		Delete the following citations: 8-5-320.4.1, 8-5-320.4.2, and 8-5-320.4.3 8-5-405.1, 8-5-405.2, and 8-5-405.3	For consistency in approach, these subparagraphs all apply, therefore only the rolled up citations 8-5-320.4 and 8-5-405 should be included in the table.
71.	IV-E	S9	BAAQMD 8-5	Did not add 8-5-322.6 as requested.	Add the following citation: 8-5-322.6	Correct omission. Add applicable citation.
72.	IV-E	S9	40 CFR 60 Subpart Kb 60.112b(a)(1)		Change Regulation Title column to: “Standards for Volatile Organic Compounds (VOC); internal floating roof option”	Correct error
73.	IV-E	S9	40 CFR 63 Subpart CC		Add the following citation: 63.640(c)(2)	Complete applicability path for NSPS Kb IFR tank
74.	IV-E	S9	40 CFR 63 Subpart CC 63.640(n)(8)(ii)	Citation proposed for deletion in error by Valero in a previous submittal	Do not delete 63.640(n)(8)(ii).	This citation is applicable to IFR tanks and should be retained.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
75.	IV-F, Q, R	S12, S25, S28, S26	40 CFR 63 Subpart CC		<p>Add header row for 40 CFR 63 Subpart CC National Emission Standards for Hazardous Pollutants for Petroleum Refining (8/18/95) and add the following citations, all with FE of “Y”:</p> <p>63.640(c)(3) Wastewater streams and treatment operations associated with petroleum refining process units meeting the criteria of section 63.640(a)</p> <p>63.647(a) Comply with 61.340-61.355 (Subpart FF). Owners/operators of Group 1 wastewater streams shall comply with sections 61.340 to 61.355 of 40 CFR part 61, subpart FF for each stream that meets the definition of 63.641.</p> <p>63.647(c) Owners/operators required under subpart FF of 40 CFR part 61 to perform periodic measurement of benzene concentration in wastewater, etc., shall operate consistently with the permitted concentration or operating parameter values.</p> <p>63.654(a) Owner/operators subject to the wastewater provisions of 63.647 shall comply with the recordkeeping and reporting requirements in 61.356 and 61.357 of 40 CFR part 61, subpart FF, unless they comply with those specified in paragraph (o)(2)(ii) of 63.640.</p>	Complete applicability path for wastewater tanks subject to 40 CFR 63 Subpart CC and 40 CFR 61 Subpart FF (Benzene Waste NESHAP).

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
76.	IV-F, Q, AI	S12, S25, S28, S67	40 CFR 61 Subpart FF		Add the following citations: 61.340(a) 61.349(c)(2) 61.355(i) 61.356(f)(3)	Complete the applicability path for these Benzene Waste NESHAP tanks abated by a thermal oxidizer or process heater.
77.	IV-F, Q, AI	S12, S25, S28, S67	40 CFR 61 Subpart FF		Delete the following citations: 61.349(c)(1) 61.356(a) 61.356(d) 61.356(f)(2) 61.356(f)(2)(i) 61.356(f)(2)(i)(A) 61.356(f)(2)(i)(C) 61.356(h) 61.357(d)(7) 61.357(d)(7)(iv) 61.357(d)(7)(iv)(A) 61.357(d)(7)(iv)(C) 61.357(d)(7)(iv)(G)	Delete citations that are applicable only to the control devices and not to the tanks (61.356(d)). Delete 61.356(h) and move it to the components table. Delete 61.356(f)(2) because site does not use this method. Delete all reporting as reporting is site wide rather than source-specific and the 61.357 citations are in Table IV-A (Site wide).
78.	IV-G, S, AD, AF, AI	S13, S27, S59, S63, S67	BAAQMD 8-5	Did not add new citations related to pressure vacuum valves as requested	Add the following citations: 8-5-303, 8-5-403, 8-5-404, and 8-5-605	All fixed roof tanks at the Valero Asphalt Plant have pressure vacuum valves and all are subject to these requirements for those PV valves.
79.	IV-G, S, AD, AF, AI	S13, S27, S59, S63, S67	8-5-111.3	Did not delete 8-5-111.3 as requested. "When the floating roof is resting on the leg supports, the process of filling..."	Delete 8-5-111.3	This citation is not applicable for fixed roof tanks.
80.	IV-G, S, AD, AF, AI	S13, S27, S59, S63, S67	8-5-329	Did not delete 8-5-329 as requested	Delete 8-5-329	Citation has been deleted from current version of BAAQMD 8-5.
81.	IV-G, S, AD, AF, AI	S13, S27, S59, S63, S67	8-5-603.1	Did not correct paragraph number referenced in description as requested	Change paragraph reference in description column from 8-5-311.3 to 8-5-306	Correction for current version of BAAQMD 8-5.
82.	IV-G, AD	S13, S59	40 CFR 60 Subpart Kb		Add the following citations: 60.112b(a)(3)	Complete applicability path for NSPS Kb fixed roof tanks

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
83.	IV-G, AD, AF	S13, S59, S63	40 CFR 63 Subpart CC		Add the following citations: 63.640(c)(2) Applicability and Designation of Storage Vessels 63.640(n)(8) Applicability and Designation of Affected Source Overlap for Storage Vessels – Additional requirements for Kb storage vessels	Complete 40 CFR 63 Subpart CC applicability path for NSPS Kb fixed roof tanks
84.	IV-G, AD, AF	S13, S59, S63	BAAQMD Condition 1240	Added permit condition BAAQMD Condition 1240 Part II.31a, but did not update Section IV. Modified BAAQMD Condition 1240 Part II.64a by adding, “All materials loaded at S15 must be transferred from Tanks S13, S59, or S63.” but did not update Section IV.	Add permit conditions as follows: Part II.31a, Annual Vapor Pressure Analysis, Y Part II.64a, Limitations on material transferred to S15, Y	Permit conditions are applicable to sources and should be added. Part II.31a is called out in associated Section VII tables.
85.	IV-G	S13	BAAQMD Condition 1240 Part II.32a		Change paragraph reference in description column from 8-5-311.3 to 8-5-306	Correction for current version of BAAQMD 8-5.
86.	IV-H, I, V	S14, S15, S31	BAAQMD 8-6		Add the following citations with FE=“Y”: 8-6-502 Portable Hydrocarbon detector 8-6-601 Efficiency rate determination	Add portable hydrocarbon detector and efficiency rate determination method requirements because sources are subject to emission measurement requirements of 8-6-301 and 304.
87.	IV-H, I, K	S14, S15, S17	BAAQMD Condition 1240, Parts I.19a I.19b I.19c		Delete listed permit conditions from the controlled sources (loading racks).	These permit conditions are related to temperature excursions in the abatement device (A4). They apply only to the abatement device and not the controlled sources.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
88.	IV-J	S16	N/A		Change Title of Table from " S16, TRUCK LOADING RACKS, KEROSENE OR DISTILLATE OIL " to " S16, TRUCK LOADING RACK, HEAVY VACUUM GAS OIL "	Correct name of source
89.	IV-J, K	S16, S17	BAAQMD 8-6		Add header row for BAAQMD Regulation 8, Rule 6 Organic Compounds – Organic Liquid Bulk Terminals and Bulk Plants (2/2/94) And Add the following citations with FE = Y: 8-6-110 Exemption, Low Vapor Pressure Organic Liquids 8-6-503 Burden of Proof 8-6-604 Determination of Applicability	Add Regulation 8, Rule 6 and applicable citations because sources fall under the exemption for loading of low vapor pressure materials. Included citations for burden of proof recordkeeping and appropriate method for determining vapor pressure of organic materials.
90.	IV-K	S17	BAAQMD Condition 1240 Part II.8	Did not correct name of A-4 Thermal Oxidizer as requested by Valero in June 2002 submittal	Delete "Loading Rack" from name of A4 in description column	Make A4 name consistent throughout permit. Correct error.
91.	IV-L	S18	63.644(a)(3)	Did not document in Statement of Basis the change from 63.644(a)(4) "Boiler or process heater < 44 MW" to 63.644(a)(3) "Boiler or process heater >= 44 MW or process gas introduced into flame zone"	Modify Statement of Basis	Correct omission
92.	IV-L, M	S18, S19	BAAQMD Condition 1240 Part I.16	Modified permit condition I.16 by splitting condition into two separate conditions; I.16a for source test every 6 months for NOX and CO limits, and 16b for source test every 2 years for POC destruction. Did not update Section IV permit condition citations to match.	Delete combined citation for condition 1240.I.16 and add two separate citations for I.16a and I.16b. Descriptions should read as follows: Part I.16a: Source Test Requirements for NOX and CO limits (Regulation 9-10-301, 9-10-305, Cumulative Increase, BACT) Part I.16b: Source Test Requirements for POC destruction efficiency (Cumulative Increase, Toxics)	Correct Section IV to reflect modified permit conditions.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
93.	IV-L, M	S18, S19	BAAQMD Condition 1240 Part I.17	Added new permit condition 1240.I.17 for new Authority to Construct. Did not update Section IV permit condition citations to match.	Add the following permit condition to #1240 Part I.17, S19 Source test for A/C application #7123	Correct Section IV to reflect modified permit conditions.
94.	IV-M, P, AO, AP	S19, S24, A4, A31	BAAQMD Regulation 1 and SIP Regulation 1	Did not document addition of Regulation 1 citations (1-523 subparagraphs, 1-602) and SIP Regulation 1 citations (1-523 subparagraphs) in Statement of Basis	Modify Statement of Basis	Correct omission.
95.	IV-M	S19	BAAQMD Condition 1240 Parts I.5b, I.5c, I.8	Added BACT to the description of Basis in Section VI, but did not update Section IV descriptions to match.	Add “BACT” in the parentheses in the description column	Correct Section IV to reflect modified permit conditions.
96.	IV-M	S19	BAAQMD Condition 1240, Parts I.11, I.12		Change “refinery” to “Asphalt Plant”	Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery
97.	IV-M	S19	BAAQMD Condition 1240 Parts I.19, II.60, II.63	Did not document removal of S19 from permit conditions in Statement of Basis.	Modify Statement of Basis.	Correct omission
98.	IV-M	S19	BAAQMD Condition 1240 Part II.60, Part II.63	Deleted S19 from permit conditions in Section VI, but did not update Section IV applicability to match.	Delete listed permit conditions	Permit conditions no longer apply to S19.
99.	<i>IV-M</i>	<i>S19</i>	<i>BAAQMD Condition #20617, Part 1</i>		<i>Change Part number from “Part 1” to “Part 1a”.</i> <i>Change title to “Affected Sources (9-10-301, 9-10-305)”</i>	<i>Change to correspond to Valero requested changes in permit conditions. See Attachment F for explanation</i>

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
100.	IV-M, N, O	S19, S20, S21	BAAQMD Condition #20617		<p>Add the following Part to permit condition:</p> <p>Applicable Requirement: Part 1b Regulation Title: ACP and NOx IERCs used to comply with refinery-wide average NOx limit (Regulation 2 Rule 9)</p>	Change to correspond to Valero requested changes in permit conditions. See Attachment F for explanation
101.	IV-M	S19	BAAQMD Condition #20617, Part 2		Change title to “In-stack NOx, CO, and O2 CEM or equivalent verification system (9-10-502.1)”	Change to correspond to Valero requested changes in permit conditions. See Attachment F for explanation
102.	IV-M	S19	BAAQMD Condition #20617, Parts 7 and 8		Change “NOx and CO” to “NOx, CO, and O2” in Regulation Title	Correct to correspond with permit condition basis in Section VI. Correct error
103.	IV-M	S19	BAAQMD Condition #20617, Part 10		Change title to “NOx CEM requirement if 2 source tests exceed NOx emission concentration or rate by more than 20% over any consecutive five year period (9-10-502)”	Change to correspond to Valero requested changes in permit conditions. See Attachment F for explanation
104.	IV-M, N, O	S19, S20, S21	BAAQMD Condition #19329, Part 1		Change “Regulation 9, Rule 10” to “Regulation 2-9-303.4”	Correct to correspond with permit condition basis in Section VI. Correct error
105.	IV-M, N, O	S19, S20, S21	BAAQMD Regulation 9, Rule 10		<p>Change the following: For all BAAQMD 9-10 citations, change Federally Enforceable (Y/N) to “Y”</p> <p>Add the following BAAQMD 9-10 citation: 9-10-504.1 Recordkeeping (FE=“Y”)</p>	<p>BAAQMD 9-10 is fully SIP approved (10/07/02) per 67 FR 62385.</p> <p>In 9-10-504, only subparagraph 9-10-504.1 is applicable to these sources. Subparagraph 9-10-504.2 is not applicable, therefore, it is not appropriate to list only the rolled up citation to 9-10-504.</p>

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
106.	IV-M, N, O, P	S19, S20, S21, S24	SIP Regulation 9, Rule 10		Delete SIP Regulation 9, Rule 10 and all associated citations	Current version of BAAQMD 9-10 is fully SIP approved per 67 FR 62385. Therefore, separate SIP citations are not needed.
107.	IV-M, N, O, P, X, AO, AP	S19, S20, S21, S24, S34, A4, A31	BAAQMD Condition 1240, Part I.5		Change “refinery” to “Asphalt Plant”	Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery
108.	IV-N, O	S20, S21	BAAQMD Condition #20617		<p>Add header row as follows: BAAQMD Condition #20617</p> <p>Add the following citations all with FE = “Y”: Part 1a Affected Sources (9-10-301, 9-10-305) Part 1b ACP and NOx IERCs used to comply with refinery wide average NOx limit (Regulation 2, Rule 9) Part 2 In-stack NOx, CO, and O2 CEM or equivalent verification system (9-10-502.1) Part 3 Demonstration of compliance with Regulation 9, Rule 10 (9-10-502) Part 13 Annual source tests for NOx, CO, and O2</p>	Add missing permit condition and citations. Correct omission.
109.	IV-P, AP	S24, A31	8-5-311, 8-5-311.3	Did not make changes for new version of BAAQMD 8-5 as requested	Delete 8-5-311, 8-5-311.3 and add the following: 8-5-301 Storage Tank Control Requirements (internal floating roof, external floating roof, or approved emission control system) 8-5-306 Approved Emission control System Requirements Make Federally Enforceable (Y/N) for all BAAQMD 8-5 citations “Y”	Delete citations that do not exist in current versions of BAAQMD 8-5. Incorporate applicable citations from current version of BAAQMD 8-5.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
110.	IV-P, AP	S24, A31	BAAQMD 8-8		<p>Add header row for BAAQMD Regulation 8, Rule 8</p> <p>And</p> <p>Add the following citations:</p> <p>8-8-301.3 An organic compound vapor recovery system with a combined collection and destruction efficiency of at least 95 percent by weight.</p> <p>8-8-307.2 An organic compound vapor recovery system with a combined collection and destruction efficiency of 70% by weight</p>	Add control requirements to abatement devices for consistency with approach taken throughout the permit.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
111.	IV-P	S24	40 CFR 61, Subpart FF		<p>Add “Y” to Federally Enforceable (Y/N) for all citations</p> <p>Add the following citations:</p> <p>61.340(a) 61.343(a)(1)(ii) 61.349(a) 61.349(a)(1) 61.349(b) 61.349(c) 61.349(c)(2) 61.349(e) 61.349(f) 61.349(g) 61.349(h) 61.355(i) 61.356(d) 61.356(f)(1) 61.356(f)(3) 61.356(g) 61.356(j) 61.356(j)(1) 61.356(j)(2) 61.356(j)(3) 61.356(j)(3)(i) 61.356(j)(6)</p>	<p>Correct omission.</p> <p>Add 40 CFR 61 Subpart FF Benzene Wastewater NESHAP and all citations applicable to the S24 process heater abatement device for wastewater tanks and oil-water separators. Added for consistency in approach for abatement device applicability</p>
112.	IV-P, AP	S24, A31	BAAQMD Condition 1240 Parts II.32a, II.32b, II.32c		Change paragraph reference in description column from 8-5-311.3 to 8-5-306	Correction for current version of BAAQMD 8-5.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
113.	IV- P	S24	BAAQMD 8-6		Add header row for BAAQMD Regulation 8, Rule 6 Organic Liquid Bulk Terminals and Bulk Plants (2/2/94) And Add the following citation: 8-6-301 Bulk Terminal Limitations	Add control requirements to abatement devices to make permit consistent.
114.	IV- P	S24	BAAQMD Regulation 9, Rule 10		For all BAAQMD 9-10 citations, change Federally Enforceable (Y/N) to “Y” Add the following citations (all with FE = “Y”): 9-10-504 Recordkeeping Requirements 9-10-504.2 Annual tune-up records for 9-10-306.2 sources 9-10-505 Reporting Requirements 9-10-505.1 Report any violation of 9-10-306.2 within 96 hours	BAAQMD 9-10 is fully SIP approved (10/07/02) per 67 FR 62385. Add all applicable citations from BAAQMD 9-10.
115.	IV-P	S24	BAAQMD Condition 1240		Add the following permit conditions: Part II.10 Requirement for control of S25 (Cumulative Increase) Part II.67 Requirement for control of S54 (Cumulative Increase) Part II.70 Requirement for control of S54 and destruction efficiency (Cumulative Increase, BACT)	S24 is one of the control sources listed in permit conditions. Correct omission.
116.	IV-P	S24	BAAQMD Condition 1240		Add the following permit conditions: Part II.32d Vapor recovery and fugitive emission requirement for S63 (BACT, Cumulative Increase, offsets) Part II.53 Vapor recovery and fugitive emission requirement for S65 (BACT, Cumulative Increase, offsets) Part II.86 Vapor recovery and fugitive emission requirement for S66 (BACT, Cumulative Increase, offsets)	S24 is part of the vapor recovery system for these sources. Add for consistency with other permit conditions in permit. Correct omission.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
117.	IV-P	S24	BAAQMD Condition 1240		Make the following changes: Part II.43, Add “for S3” prior to parentheses Part II.44, Add “for S3” prior to parentheses Part II.55, Add “for S5-8, S37, S38, S70” prior to parentheses Part II.56, Add “for S51-53, S60, S65” prior to parentheses Part II.57, Add “for S61, S62” prior to parentheses Part II.85, Add “for S66” prior to parentheses	Clarify controlled sources associated with each permit condition.
118.	IV-P	S24	BAAQMD Condition 1240 Part V.1	Did not document addition of Basis in Statement of Basis	Modify Statement of Basis	Correct omission
119.	IV-Q	S25	BAAQMD Condition 1240 Part II.10		Add a header row prior to Part II.10 that states, “The following permit condition is applicable only to S25.”	Table IV-Q includes both S25 and S28, but permit condition is applicable only to S25.
120.	IV-R, AE	S26, S61, S62,	BAAQMD Regulation 8, Rule 5	Did not change date to 11/27/02 as requested.	Change date to 11/27/02	Correct error
121.	IV-R, S	S26, S27	NA		Change titles of tables as follows: Table IV-R: S26, Wastewater Tank, Abated by Carbon or Thermal Oxidizer or Process Heater Table IV-S: S27, Recovered Oil Tank – TK-12A, Abated by Carbon or Thermal Oxidizer or Process Heater	Consistency and clarification

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
122.	IV-R, S	S26, S27	40 CFR 61 Subpart FF		Add the following citations: 61.340(a) 61.349(a)(2)(i) 61.349(a)(2)(i)(A) 61.349(c)(2) 61.354(c)(1) 61.354(c)(4) 61.355(i) 61.356(f)(3) 61.356(j)(4) 61.356(j)(6)	Complete the applicability path for these Benzene Waste NESHAP tanks abated by carbon or thermal oxidizer or process heater.
123.	IV-R, S	S26, S27	40 CFR 61 Subpart FF		Delete the following citations: 61.356(a) 61.356(d) 61.356(h) 61.357(d)(7) 61.357(d)(7)(iv) 61.357(d)(7)(iv)(I)	Delete citation 61.356(d) because it is applicable only to the control device and not the tank. Delete 61.356(h) and moved it to the components table (IV-AN). Delete all 61.357 citations because reports are all submitted on a site wide basis and these citations are in Table IV-A rather than individual source tables.
124.	IV-S, AI	S27, S67	8-5-328.1.2	Did not delete tank degassing citation 8-5-328.1.2 as requested	Delete tank degassing citation 8-5-328.1.2	Tank degassing requirements of 8-5-328.1.2 are applicable only to tanks larger than 75 cubic meters (~19,000 gallons). Neither S27 nor S67 is large enough to be subject to this requirement. S27 is only 1260 gallons and S67 is only 5875 gallons. Correct error
125.	IV-S	S27, S67, AI	8-5-328, 8-5-328.2	Did not delete 8-5-328 and 8-5-328.2 as requested.	Retain these citations, but change description of 8-5-328 to "Tank Degassing Requirements"	These citations are applicable regardless of tank size and should be in the table. Change the description to match the regulatory language in the current version of BAAQMD 8-5.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
126.	IV-U	S30	NESHAPS Part 63 Subpart Y	Did not delete “Y” from Federally Enforceable Y/N column in header row as requested by Valero in June 2002 submittal	Change Applicable Requirement from “NESHAPS Part 63 Subpart Y” to “40 CFR 63 Subpart Y”. Delete “Y” from Federally Enforceable Y/N column in header row	Consistency in approach and naming conventions throughout permit.
127.	IV-U	S30	BAAQMD Condition 1240, Parts III.7, III.8	Did not change “(Basis: Synthetic minor condition)” to “(Basis: Cumulative Increase)” in permit condition as requested by Valero in June 2002 submittal.	Change “(Synthetic minor condition)” to “(Cumulative Increase)” See comment at VI for these permit conditions to change permit condition language.	Correct error.
128.	IV-V	S31	BAAQMD Condition 1240		Add the following permit condition: Part I.14, Facility Limits (Cumulative Increase)	All sources are subject to this condition. Correct omission.
129.	IV-W				<i>Delete Table IV-W in its entirety. If Section IV tables following IV-W are renumbered after the deletion, then also renumber corresponding Section VII tables.</i>	<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
130.	IV-Y, Z	S39, S40	40 CFR 63 Subpart CC		<p>Add a header row for: 40 CFR 63 Subpart CC, National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries (06/12/1996)</p> <p>Add the following citations, all with FE = "Y": 40 CFR 63.640(c)(2) Applicability and Designation of Storage Vessels 40 CFR 63.646(b)(1) Storage Vessel Provisions--Determine stored liquid % OHAP for group determination 40 CFR 63.646(b)(2) Storage Vessel Provisions--Determine stored liquid % OHAP-method 18 to resolve disputes 40 CFR 63.654(h)(6) Reporting and Recordkeeping Requirements--Other reports--Determination of Applicability 40 CFR 63.654(h)(6)(ii) Reporting and Recordkeeping Requirements--Other reports--Determination of Applicability 40 CFR 63.654(i)(1) Reporting and Recordkeeping Requirements--Recordkeeping for storage vessels 40 CFR 63.654(i)(1)(i) Reporting and Recordkeeping Requirements--Recordkeeping for storage vessels 40 CFR 63.654(i)(1)(iv) Reporting and Recordkeeping Requirements--Recordkeeping for storage vessels</p>	These tanks are MACT Group 2 storage vessels and are subject to MACT recordkeeping requirements. Correct omission
131.	IV-AA	S41	BAAQMD 8-8		Add the following citation with FE="Y": 8-8-602 Determination of Emissions	Add method for determination of emissions because source is subject to 8-8-307.2, which is referenced in 8-8-602.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
132.	IV-AA, AH	S41, S66	40 CFR 61 Subpart FF		Add the following citations: 61.340(a) 61.349(c)(2) 61.354(c)(4) 61.355(i) 61.356(f) 61.356(f)(1) 61.356(f)(3) 61.356(g) 61.356(j) 61.356(j)(1) 61.356(j)(2) 61.356(j)(3) 61.356(j)(3)(i) 61.356(j)(4) 61.356(j)(6)	Add 40 CFR 61 Subpart FF Benzene Wastewater NESHAP citations applicable to the S41 Wemco Hydrotreater and S66 Oil Water Separator
133.	IV-AA, AH	S41, S66	40 CFR 61 Subpart FF		Delete the following citations: 61.349(c)(1) 61.356(d)	Delete 61.356(d) because it applies only to the control device and not to the source. Delete other non-applicable citations
134.	IV-AA, AH	S41, S66	BAAQMD 8-8		Add the following citations with FE="Y": 8-8-114 Exemption, Bypassed Oil-Water Separator or Air Flotation Inlet 8-8-601 Wastewater Analysis for Critical OCs	Add bypass exemption for wastewater that bypasses the API separator or air flotation unit inlet and method for determining critical OCs as required for records in 8-8-501.
135.	IV-AA, AH	S41, S66	BAAQMD 8-8		Delete the following citations: 8-8-503 8-8-603	Sources are not subject to any inspection or repair procedures in the 8-8-3xx sections referenced in these citations and are, therefore, not subject to the inspection and repair records or inspection procedure requirements

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
136.	IV-AB	S51-53	BAAQMD Condition #1240, Part II.50		Delete NSPS from parentheses.	Correct error to agree with permit condition in Section VI.
137.	IV-AC	S54	BAAQMD Regulation 8, Rule 6		Add “Y” to Federally Enforceable (Y/N) for all citations	Correct omission
138.	IV-AD, AF	S59, S63	60.112b(b)(1)	Did not delete citation as stated in Statement of Basis, page 13	Delete 60.112b(b)(1)	Tank is not at 11 psia or more (rationale from Statement of Basis, page 13)
139.	IV-AD	S59	BAAQMD Condition 1240 Part II.32b		Change paragraph reference in description column from 8-5-311.3 to 8-5-306	Correction for current version of BAAQMD 8-5.
140.	IV-AF	S63	BAAQMD Condition 1240 Part II.32c		Change paragraph reference in description column from 8-5-311.3 to 8-5-306	Correction for current version of BAAQMD 8-5.
141.	IV-AF	S63	BAAQMD Condition 1240		Add permit condition as follows: Part II.32d, Vapor Recovery and Fugitive Emissions Requirements, Y	Permit condition applies to source and should be added. Correct omission.
142.	IV-AI	S67	40 CFR 61 Subpart FF		Add date of” (1/7/1993)” Add the following citations: 61.340(a) 61.349(c)(2) 61.355(i) 61.356(f)(3) 61.356(j)(6)	Correct omission. Add applicable citations

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
143.	IV-AI	S67	40 CFR 61 Subpart FF		Delete the following citations: 61.349(c)(1) 61.356(a) 61.356(d) 61.356(f)(2) 61.356(f)(2)(i) 61.356(f)(2)(i)(A) 61.356(h) 61.357(d)(7) 61.357(d)(7)(iv) 61.357(d)(7)(iv)(A) 61.357(d)(7)(iv)(C)	Delete citations that are applicable only to the control devices and not to the tanks (61.356(d)). Delete other non-applicable citations.
144.	IV-AJ	S68	BAAQMD Condition 1240 Part I.5	Modified permit condition to except S68 from its requirements but did not update Section IV or Section VII for the change.	Delete BAAQMD Condition 1240 I.5 for S68.	S68 is specifically excepted from the permit condition
145.	IV-AL	S70	40 CFR 63 Subpart CC		Delete 40 CFR 63 Subpart CC and all citations.	Tank S70 (2,200 gallons) is below the size threshold (~10,200 gallons or 40 m[3]) and not subject to 40 CFR 63 Subpart CC. Correct error.
146.	IV-AL	S70	BAAQMD Condition 1240		Add "Y" to Federally Enforceable (Y/N) for all condition parts where column is empty	Correct omission
147.	IV-AM				Change "refinery" to "Asphalt Plant" in table introduction following title	Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery
148.	IV-AM			Did not add ", S67 Recovered Oil Tank" to third row of Process Unit column after "Recovered Oil Equipment" as requested by Valero in June 2002 submittal.	Add ", S67 Recovered Oil Tank" to third row of Process Unit column after "Recovered Oil Equipment".	Make list of applicable sources complete. Correct omission.
149.	IV-AM				Delete row for "S32 LGO Stripper Tower and associated piping"	S32 no longer exists and has been physically removed from the Asphalt Plant.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
150.	IV-AM				Change " S16, Loading Racks - Kerosene or Distillate Oil" to " S16, Truck Loading Rack - Heavy Vacuum Gas Oil"	Correct name of source
151.	IV-AN	Components	BAAQMD Regulation 8, Rule 18 8-18-601 8-18-602 8-18-603		Add "N" to Federally Enforceable (Y/N) column for each citation	Correct omission. There is no SIP-approved version of 8-18.
152.	IV-AN	Components	BAAQMD Regulation 8, Rule 28 AND SIP Regulation 8, Rule 28	Did not delete "N" from Federally Enforceable (Y/N) in regulation header rows as requested by Valero in June 2002 submittal.	Delete "N" from Federally Enforceable (Y/N) in regulation header rows of BAAQMD Regulation 8, Rule 28 AND SIP Regulation 8, Rule 28	Consistency
153.	IV-AN	Components	NSPS Part 60 Subpart VV; BAAQMD Regulation 10-52		Change "NSPS Part 60" to "40 CFR 60"	Clarify table and consistency with rest of permit in naming conventions
154.	IV-AN	Components	NESHAP Part 61 Subpart FF		Add the following citations with FE="Y": 61.355(h) Test Methods, procedures, and compliance methods; no detectable emissions 61.356(h) Recordkeeping Requirements: No detectable emissions tests per 61.343 through 61.347, and 61.349	Add test methods and move recordkeeping from individual source tables to fugitive components table.
155.	IV-AN	Components	NESHAP Part 63 Subpart CC		Change "NESHAP Part 63" to "40 CFR 63" Add date of 8/18/95	Clarify table and consistency with rest of permit in naming conventions. Correct omission
156.	IV-AN	Components	BAAQMD Condition 1240		Add header for Permit Condition as follows: BAAQMD Condition # 1240	Clarify table and consistency with rest of permit

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
157.	IV-AN	Components	BAAQMD Condition 1240 Parts I.18 I.18a		Add the following permit conditions: Part I.18, Cumulative Increase Monitoring (Cumulative Increase) Part I.18a, NMHC and NOx estimates (Cumulative Increase)	Components are subject to these permit conditions and they should be added. Correct omission
158.	IV-AO	A4	BAAQMD Condition 1240		Add the following permit conditions: Part II.59, Requirements for control of S14 (Cumulative Increase, Offsets, BACT, Toxics) Part II.62, Requirements for control of S15 (Cumulative Increase, Offsets, BACT, Toxics) Part II.65, Requirements for control of S17 (Cumulative Increase)	For consistency in approach, add permit conditions for controlled sources
159.	IV-AO	A4	BAAQMD Condition 1240		Modify the following permit conditions: Part II.6, Add “for S18” prior to parentheses Part II.60, Add “for S14” prior to parentheses Part II.63, Change “Requirement for vapor recovery and abatement” to “Destruction efficiency requirements for S15” Part II.68, Add “for S17” prior to parentheses	Clarify applicability of each citation to associated controlled source. Correct inconsistency in descriptions.
160.	IV-AO	A4	BAAQMD Condition 1240 Parts II.32a II.32b II.32c		Delete these permit conditions for this source.	These permit conditions are not applicable to A4. These are permit conditions related to A31 and S24 abatement for S13, S59, and S63 tanks. Correct error
161.	IV-AP	A31	BAAQMD Regulation 1	Did not add 1-107 as stated in Statement of Basis, page 14	Add the following citation: 1-107, Combination of Emissions, with “Y” for FE	The device is subject to several standards and burns fuel or off-gases from several sources (from Statement of Basis). Correct omission

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
162.	IV-AP	A31	40 CFR 61 Subpart FF	Did not delete "N" from Federally Enforceable (Y/N) in regulation header rows as requested by Valero in June 2002 submittal.	Delete "N" from Federally Enforceable (Y/N) in regulation header row of 40 CFR 61 Subpart FF	Consistency
163.	IV-AP	A31	40 CFR 61 Subpart FF		Add the following citations: 61.340(a) 61.343(a)(1)(ii) 61.349(a)(1) 61.349(c)(2) 61.355(i) 61.356(f)(3) 61.356(g) 61.356(j)(3)(i)	Add applicable citations
164.	IV-AP	A31	40 CFR 61 Subpart FF	Did not delete citations as requested by Valero in June 2002 submittal or as stated in Statement of Basis, page 15. Statement of Basis states that the following were deleted: 61.356(a), 61.356(d), 61.356(f), and 61.356(i) and all subparagraphs	Delete only the following citations: 61.349(c)(1) 61.356(f)(2) 61.356(f)(2)(i) 61.356(f)(2)(i)(A) 61.356(f)(2)(i)(C) 61.357(d)(7) 61.357(d)(7)(iv) 61.357(d)(7)(iv)(A)	Delete non-applicable citations and update Statement of Basis
165.	IV-AP	A31	BAAQMD Condition 1240 Part I.19	Did not delete as requested by Valero in June 2002 submittal.	Delete permit condition.	BAAQMD Condition 1240 Part I.19 is not applicable to A31 (only to A4). Correct error.
166.	IV-AP	A31	BAAQMD Condition 1240		Add the following permit conditions: Part II.10 Requirement for control of S25 (Cumulative Increase) Part II.66 Requirement for control of S31 (Cumulative Increase) Part II.67 Requirement for control of S54 (Cumulative Increase)	A31 is one of the control sources listed in permit conditions. Add for consistency with other permit conditions in permit.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
167.	IV- AP	A31	BAAQMD Condition 1240		Add the following permit conditions: Part II.32d Vapor recovery and fugitive emission requirement for S63 (BACT, Cumulative Increase, offsets) Part II.44 Vapor recovery and fugitive emission requirement for S3 (BACT, Cumulative Increase, offsets) Part II.53 Vapor recovery and fugitive emission requirement for S65(BACT, Cumulative Increase, offsets) Part II.86 Vapor recovery and fugitive emission requirement forS66 (BACT, Cumulative Increase, offsets)	A31 is part of the vapor recovery system for these sources. Add for consistency with other permit conditions in permit.
168.	IV- AP	A31	BAAQMD Condition 1240		Change the following permit conditions: Part II.32a, Add “for S13” prior to parentheses Part II.43, Add “for S3” prior to parentheses Part II.55, Add “for S5-8, S37, S38, S70” prior to parentheses Part II.56, Add “for S51-53, S60, S65” prior to parentheses Part II.57, Add “for S61, S62” prior to parentheses Part II.69 Add “for S31” prior to parentheses Part II.70 Add “for S54” prior to parentheses Part II.85 Add “For S66” prior to parentheses	Consistency and clarification
169.	VI	NA	Introduction to Condition #1240		Change “refinery” to “Asphalt Plant” in third, fourth, and sixth paragraphs.	To distinguish Valero Benicia Asphalt Plant from Valero Refinery
170.	VI	NA	Condition 1240, Part I, Title		Change “I. REFINERY CONDITIONS” to I. ASPHALT PLANT CONDITIONS”.	To distinguish Valero Benicia Asphalt Plant from Valero Refinery

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
171.	VI	S32	1240.I.3		Delete "and S32 LGO Gas Stripper"	S32 no longer exists and has been physically removed from the Asphalt Plant.
172.	VI	S19	1240.I.5b 1240.I.5c 1240.I.8	Did not document changes in the limits in these permit conditions or their basis in Statement of Basis.	Modify Statement of Basis	Correct omission
173.	VI	N/A	1240.I.5, 1240.I.6, 1240.I.11, 1240.I.12, 1240.I.13, 1240.I.14, 1240.I.15, 1240.III.2, <u>1240.III.3,</u> 1240.III.9.d.		Change "refinery" to "Asphalt Plant" each time it occurs in each paragraph	To distinguish Valero Benicia Asphalt Plant from Valero Refinery. <u>This change is particularly important to distinguish between the Asphalt Plant and Refinery fuel gas systems in Part III.3.</u>
174.	VI	Site wide	1240.I.14	Did not document change in Asphalt Plant-wide emissions limits in Statement of Basis.	Modify Statement of Basis	Correct omission
<u>175.</u>	<u>VI</u>	<u>S19</u>	<u>1240.I.16a</u>	<u>Changed conditions for S19 source test from "highest duty possible for the prevailing process conditions" to "a minimum of 85% of the maximum capacity of 40 MMBtu/hr (34 to 40 MMBtu/hr)" and added BACT as a reason for the permit condition</u>	<u>Delete "a minimum of 85% of the maximum capacity of 40 MMBtu/hr (34 to 40 MMBtu/hr)"; and Do not delete "highest duty possible for the prevailing process conditions"</u>	<u>It is very difficult to run this source at the upper end of its limit. The normal operating duty for S19 is approximately 30 MMBTU/hr. It will be difficult to adjust the operating parameters for this device to reach the upper duty range for frequent (semi-annual) source tests.</u>
176.	VI	S19	1240.I.16a		Change "CO limit in part 5b of this condition" to "CO limits in part 5b and part 5c of this condition"	Table VII-L for S19 contains a requirement for a source test every six months to verify the CO limit in 1240.I.5c, but the permit condition does not require such a test. Correct omission

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
177.	VI	S19	1240.I.17	Added new A/C conditions for S19 as required by permit application #7123 (March 2003). Not documented in Statement of Basis	Add explanation of all changes due to permit application #7123 in Statement of Basis	Correct omissions
178.	VI	Site wide	1240.I.18 1240.I.20	Did not document addition of this permit condition (and all subparagraphs) in Statement of Basis	Modify Statement of Basis	Correct omission
179.	VI	S67	1240.I.18e	Did not add S67 as stated in Statement of Basis, page 17	Add S67 after S66 in condition 1240.I.18e	Correct omission
180.	VI	A4	1240.I.19	Did not document addition of this permit condition (and all subparagraphs) in Statement of Basis or modification to delete S19.	Modify Statement of Basis	Correct omission
181.	VI	S32	1240.II.6		Delete ", and the LGO Stripper, S32,"	S32 no longer exists and has been physically removed from the Asphalt Plant.
182.	VI	S25, S3, S41	Source descriptions and 1240.II.10	Changed source descriptions and permit conditions for venting tanks and abating them by Mist Eliminators and A31 or S24 and for operating vapor recovery systems as requested except the following: 1240.II.10; S3 Source description (before 1240.II.40); S41 Source description (after 1240.II.91a)	Change the following: 1240.II.10: Change "A3" to "A1 or A3" and Change "F-10" to "F-8 or F-10" S3 Source Description (before 1240.II.40): Change "F-100" to "F-500" S41 Source Description (after 1240.II.91a): Change "A1 or A3 Mist Eliminator" to "A1 or A3 Mist Eliminator F-8 or F-10"	Correct errors
183.	VI	S13, S59, S63	1240.II.32a, 1240.II.32b, 1240.II.32c		Change 8-5-311.3 to 8-5-306 in parentheses at end of each permit condition	Correct for current version of BAAQMD 8-5.

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
184.	VI	S54	Source description before 1240.II.65		Change name of S54 from "Asphalt and Light Vacuum Gas Oil Loading Rack" to "Asphalt Loading Rack"	Correct name and clarify function of source S54
185.	VI	S16	Source description before 1240.II.90		Change name of S16 from "Kerosene and Heavy Vacuum Gas Oil Loading Rack" to "Heavy Vacuum Gas Oil Loading Rack"	Correct name and clarify function of source S16
186.	VI	S30	1240.III.7, 1240.III.8	Did not change "(Basis: Synthetic minor condition)" to "(Basis: Cumulative Increase)" as requested by Valero in June 2002 submittal.	Change "(Basis: Synthetic minor condition)" to "(Basis: Cumulative Increase)"	Correct error.
187.	VI	S69, S70	20278.3		Change name of A31 from "Rail Road Thermal Oxidizer" to "Thermal Oxidizer"	Correct name for consistency with other corrections made previously for A-31.
188.	VI	S19, S20, S21	19329 and 20617		<i>Modify BAAQMD Conditions 19329 and 20617 as shown in Attachment F</i>	<i>See Valero explanations in Attachment F with further discussion in the WSPA comments (Attachment E).</i>
189.	VIII		BAAQMD 8-5-301		Replace the Applicable Requirement with the following: <i>BAAQMD 8-5-301, 8-5-501.1, 8-5-117</i>	Add all applicable requirements associated with this test method. Correct for current version of BAAQMD 8-5

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
190.	VIII		BAAQMD 8-5-306		<p>Replace the Description of Requirement with the following:</p> <p>Abatement efficiency of 95% by weight of Approved Emission Control System</p> <p>Replace the Acceptable Test Methods with the following:</p> <p>Manual of Procedures, Volume IV, ST-4, Bulk Gasoline Loading Terminals. *</p> <p>NOTE: This source test has been deleted without replacement from the MOP, but is still called out in the regulation.</p>	Correct the requirement and test methods for 8-5-306. Correct for current version of BAAQMD 8-5
191.	VIII		BAAQMD 8-5-320.3		<p>Replace the Applicable Requirement with the following:</p> <p>BAAQMD 8-5-303.2, 8-5-306, 8-5-307</p> <p>Replace the Description of Requirement with the following:</p> <p>Organic compound leak concentration</p>	<p>Correct the applicable requirement (8-5-320.3 was the paragraph reference in the previous version of BAAQMD 8-5 for PV valves. It is now 8-5-303.2).</p> <p>Add other BAAQMD 8-5 citations with gas tight (fugitive) requirements. Correct for current version of BAAQMD 8-5</p>
192.	VIII		BAAQMD 8-5-328.1.2		<p>Add “8-5-603.2” to the Applicable Requirement</p> <p>Replace the Description of Requirement with the following:</p> <p>Abatement efficiency of 90% by weight of Approved Emission Control System</p>	Correct the requirements that this test method satisfies
193.	VIII		BAAQMD 8-5-603.2		Delete this row	Delete duplicate information (calls out source test for 8-5-328.1.2 abatement efficiency)

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Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
194.	VIII		SIP 8-5-304 SIP 8-5-311.3 SIP 8-5-328.2 SIP 8-5-603.2		Delete these rows	Current version of BAAQMD 8-5 is SIP approved. All SIP citations are no longer applicable.
195.	VIII		BAAQMD 8-6-603		Delete this row	Permit changed by replacing 8-6-603 with 8-6-604 because method specified in 8-6-603 does not give accurate values for asphalt materials. The appropriate test method has been added for 8-6-604.
196.	VIII		BAAQMD 8-18-306		In the Acceptable Test Methods, correct “EPAA-453/R-95-017” to “EPA-453/R-95-017”	Correct error
197.	VIII		40 CFR 60.104(a)(1)		Add header row as follows: NSPS Part 60 Subpart J, Standards of Performance for Petroleum Refineries (7/1/00) Replace the Acceptable Test Methods with the following: 40 CFR 60, Appendix A, EPA Method 11, Determination of Hydrogen Sulfide Content of Fuel Gas Streams in Petroleum Refineries and 40 CFR 60, Appendix B, Performance Specification 7, Specifications and Test Procedures for Hydrogen Sulfide Continuous Emission Monitoring Systems in Stationary Sources	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
198.	VIII		40 CFR 60.112b		<p>Replace the Applicable Requirement with the following:</p> <p>40 CFR 60.112b(a)</p> <p>Replace the Acceptable Test Methods with the following:</p> <p>API Bulletin 2517 (crude oil and refined petroleum products) or ASTM Method D2879-83, 96, 97 or standard reference texts (other liquids)</p>	Add all acceptable test methods. Tanks at asphalt plant currently subject to vapor pressure determination requirements would use the API bulletin.
199.	VIII		(NEW) BAAQMD 1-522		<p>Add the following</p> <p>Applicable Requirement: BAAQMD 1-522</p> <p>Description of Requirement: Continuous Emission monitoring</p> <p>Acceptable Test Methods: Manual of Procedures, Volume V</p>	Add applicable test methods. Update for permit modifications.
200.	VIII		(NEW) BAAQMD 6-303.1		<p>Add the following</p> <p>Applicable Requirement: BAAQMD 6-303.1</p> <p>Description of Requirement: Ringelmann No. 2 Limitation</p> <p>Acceptable Test Methods: Manual of Procedures, Volume I, Evaluation of Visible Emissions</p>	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
201.	VIII		(NEW) BAAQMD 6-311		Add the following : Applicable Requirement: BAAQMD 6-311 Description of Requirement: General Operations Acceptable Test Methods: Manual of Procedures, Volume IV, ST-15, Particulates Sampling, EPA Method 5	Add applicable test methods. Update for permit modifications.
202.	VIII		(NEW) BAAQMD 8-5-328.1.2		Add the following: Applicable Requirement: BAAQMD 8-5-328.1.2 Description of Requirement: Organic concentration in tank < 10,000 ppm as methane after degassing Acceptable Test Methods: 8-5-503 Portable Hydrocarbon Detector (EPA reference method 21 (40 CFR 60, Appendix A), Determination of Volatile Organic Compound Leaks)	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
203.	VIII		(NEW) BAAQMD 8-6-604		<p>Add the following:</p> <p>Applicable Requirement: BAAQMD 8-6-604</p> <p>Description of Requirement: Determination of TVP</p> <p>Acceptable Test Methods: EPA-450/3-87-026 (Exhibit A-2 in Appendix A or Appendix D)</p> <p>Or</p> <p>Standard reference texts</p> <p>Or</p> <p>Raoult's Law of Partial Pressures (for liquid mixtures) as defined in 8-6-205 or ASTM Method D 2879-83</p>	Add applicable test methods. Update for permit modifications.
204.	VIII		(NEW) BAAQMD 8-8-301.3		<p>Add the following:</p> <p>Applicable Requirement: BAAQMD 8-8-301.3</p> <p>Description of Requirement: Oil Water Separator Vapor Recovery Requirements</p> <p>Acceptable Test Methods: Manual of Procedures, Volume IV, ST-7 Non-Methane Organic Carbon Sampling</p> <p>Or</p> <p>EPA Method 25 or 25A</p>	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
205.	VIII		(NEW) BAAQMD 8-8-303		Add the following: Applicable Requirement: BAAQMD 8-8-303 Description of Requirement: Gauging and Sampling Device on OWS - vapor tight cover, seal, or lid Acceptable Test Methods: EPA reference method 21 (40 CFR 60, Appendix A), Determination of Volatile Organic Compound Leaks	Add applicable test methods. Update for permit modifications.
206.	VIII		(NEW) BAAQMD 8-8-307.2		Add the following: Applicable Requirement: BAAQMD 8-8-307.2 Description of Requirement: Air Flotation Unit Vapor Recovery Requirements Acceptable Test Methods: Manual of Procedures, Volume IV, ST-7 Non-Methane Organic Carbon Sampling Or EPA Method 25 or 25A	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
207.	VIII		(NEW) BAAQMD 8-28-304.2		Add the following: Applicable Requirement: BAAQMD 8-28-304.2 Description of Requirement: Pressure Relief Device Vapor Recovery Requirements after Repeat Releases Acceptable Test Methods: Manual of Procedures, Volume IV, ST-7 Or EPA Method 25 or 25A Or Other methods to demonstrate control efficiency (i.e. BAAQMD Condition 1240, part I.19 or II.58b, Source tests for abatement devices A4 or A24 & A31)	Add applicable test methods. Update for permit modifications.
208.	VIII		(NEW) BAAQMD 9-1-301, 9-2-301		Add the following: Applicable Requirement: BAAQMD 9-1-301, 9-2-301 Description of Requirement: Ground Level Monitoring Acceptable Test Methods: Manual of Procedures, Volume VI, Section 1, Area Monitoring	Add applicable test methods. Update for permit modifications.
209.	VIII		(NEW) BAAQMD 9-1-304		Add the following: Applicable Requirement: BAAQMD 9-1-304 Description of Requirement: Fuel Burning (Liquid Fuels) Acceptable Test Methods: Manual of Procedures, Volume III, Method 10, Determination of Sulfur in Fuel Oils.	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
210.	VIII		BAAQMD 9-1-313.2 and SIP 9-1-313.2		Add the following: Applicable Requirement: BAAQMD 9-1-313.2 and SIP 9-1-313.2 Description of Requirement: H2S Abatement Efficiency Acceptable Test Methods: Manual of Procedures, Volume III, Lab 25, Determination of H2S in Effluents or equivalent method approved by the APCO	Add applicable test methods. Update for permit modifications.
211.	VIII		(NEW) BAAQMD 9-1-501, 9-2-501		Add the following: Applicable Requirement: BAAQMD 9-1-501, 9-2-501 Description of Requirement: Continuous Monitoring Acceptable Test Methods: Manual of Procedures, Volume V, Continuous Monitoring	Add applicable test methods. Update for permit modifications.
212.	VIII		(NEW) BAAQMD 9-10-303		Add the following: Applicable Requirement: BAAQMD 9-10-303 Description of Requirement: Emission Limit for Facility (Federal Requirement), 0.20 lb NO _x /MMBTU Acceptable Test Methods: Equivalent verification system pursuant to 9-10-502 (i.e., Source tests specified in BAAQMD Condition 1240, part I.16a (S-19 only) or BAAQMD Condition 20617, parts 7 and 8 (S-19) and part 13 (S20, S21))	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
213.	VIII		(NEW) BAAQMD 9-10-306.2		Add the following: Applicable Requirement: BAAQMD 9-10-306.2 Description of Requirement: Small unit tune-up requirements Acceptable Test Methods: Manual of Procedures, Volume 1, Chapter 5, Boiler, Steam Generator, and Process Heater Tuning Procedure	Add applicable test methods. Update for permit modifications.
214.	VIII		(NEW) 40 CFR 60.112b(a)(3)(i)		Add the following: Applicable Requirement: 40 CFR 60.112b(a)(3)(i) Description of Requirement: NSPS Subpart Kb Closed Vent System – leak detection Acceptable Test Methods: 60 Subpart VV, 60.485(b); EPA reference method 21 (40 CFR 60, Appendix A), Determination of Volatile Organic Compound Leaks	Add applicable test methods. Update for permit modifications.
215.	VIII		(NEW) 40 CFR 60.112b(a)(3)(ii)		Add the following: Applicable Requirement: 40 CFR 60.112b(a)(3)(ii) Description of Requirement: NSPS Subpart Kb Closed Vent System Performance (95% efficiency) Acceptable Test Methods: 40 CFR 60 Subpart Kb 60.113b(c) Testing and Procedures	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
216.	VIII		(NEW) 40 CFR 60.113b(b)(4) (i)		Add the following: Applicable Requirement: 40 CFR 60.113b(b)(4)(i) Description of Requirement: NSPS Subpart Kb External Floating Roof Tank primary rim seal gap measurement Acceptable Test Methods: 40 CFR 60 Subpart Kb 60.113b(b)(1) through 60.113b(b)(3) Testing and Procedures	Add applicable test methods. Update for permit modifications.
217.	VIII		(NEW) 40 CFR 60.113b(b)(4) (ii)		Add the following: Applicable Requirement: 40 CFR 60.113b(b)(4)(ii) Description of Requirement: NSPS Subpart Kb External Floating Roof Tank secondary rim seal gap measurement Acceptable Test Methods: 40 CFR 60 Subpart Kb 60.113b(b)(1) through 60.113b(b)(3) Testing and Procedures	Add applicable test methods. Update for permit modifications.
218.	VIII		(NEW) 40 CFR 60.485(d)		Add the following: Applicable Requirement: 40 CFR 60.485(d) Description of Requirement: Determine % VOC content in process fluid Acceptable Test Methods: ASTM E260-73, 91, or 96 OR ASTM E168-67, 77, or 92 OR ASTM E169-63, 77, or 93	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
219.	VIII		(NEW) 40 CFR 60.485(e)		Add the following: Applicable Requirement: 40 CFR 60.485(e) Description of Requirement: Demonstrate equipment is in light liquid service Acceptable Test Methods: ASTM D2879-83, 96, or 97 (Vapor pressure) Or Standard reference texts	Add applicable test methods. Update for permit modifications.
220.	VIII		(NEW) 40 CFR 61.343(a)(1)(i)(A)		Add the following: Applicable Requirement: 40 CFR 61.343(a)(1)(i)(A) Description of Requirement: Tank fittings leak detection Acceptable Test Methods: 40 CFR 60 Appendix A, Method 21 as specified in 40 CFR 61 Subpart FF 61.355(h)	Add applicable test methods. Update for permit modifications.
221.	VIII		(NEW) 40 CFR 61.345(a)(1)(i)		Add the following: Applicable Requirement: 40 CFR 61.345(a)(1)(i) Description of Requirement: Container fittings leak detection Acceptable Test Methods: 40 CFR 60 Appendix A, Method 21 as specified in 40 CFR 61 Subpart FF 61.355(h)	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
222.	VIII		(NEW) 40 CFR 61.347(a)(1)(i) (A)		Add the following: Applicable Requirement: 40 CFR 61.347(a)(1)(i)(A) Description of Requirement: Oil/Water Separator fittings leak detection Acceptable Test Methods: 40 CFR 60 Appendix A, Method 21 as specified in 40 CFR 61 Subpart FF 61.355(h)	Add applicable test methods. Update for permit modifications.
223.	VIII		(NEW) 40 CFR 61.349(a)(1)(i))		Add the following: Applicable Requirement: 40 CFR 61.349(a)(1)(i) Description of Requirement: Closed-vent system leak detection Acceptable Test Methods: 40 CFR 60 Appendix A, Method 21 as specified in 40 CFR 61 Subpart FF 61.355(h)	Add applicable test methods. Update for permit modifications.
224.	VIII		(NEW) 40 CFR 61.349(a)(2)(i) (A)		Add the following: Applicable Requirement: 40 CFR 61.349(a)(2)(i)(A) Description of Requirement: Enclosed Combustion Control Device Requirements, > 95% reduction Acceptable Test Methods: 40 CFR 61 Subpart FF 61.355 Test Methods, Procedures, and Compliance Provisions	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
225.	VIII		(NEW) 40 CFR 61.349(a)(2)(i) i)		Add the following: Applicable Requirement: 40 CFR 61.349(a)(2)(ii) Description of Requirement: Carbon Adsorption Control Device Requirements, 95% VOC or 98% benzene reduction Acceptable Test Methods: 40 CFR 61 Subpart FF 61.356 Recordkeeping Requirements	Add applicable test methods. Update for permit modifications.
226.	VIII		(NEW) 40 CFR 61.342(e)(2)(i))		Add the following: Applicable Requirement: 40 CFR 61.342(e)(2)(i) Description of Requirement: Uncontrolled Benzene Wastewater Limit Acceptable Test Methods: 40 CFR 61 Subpart FF 61.355 Test Methods, Procedures, and Compliance Provisions	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
227.	VIII		(NEW) 40 CFR 61.355(c)(3)		<p>Add the following:</p> <p>Applicable Requirement: 40 CFR 61.355(c)(3)</p> <p>Description of Requirement: Measure benzene concentration in waste streams</p> <p>Acceptable Test Methods: From “Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,” EPA Publication No. SW-846:</p> <p>(1) Method 8020, Aromatic Volatile Organics,</p> <p>(2) Method 8021, Volatile Organic Compounds in Water by Purge and Trap Capillary Column Gas Chromatography with Photoionization and Electrolytic Conductivity Detectors in Series</p> <p>(3) Method 8240, Gas Chromatography/Mass Spectrometry for Volatile Organics</p> <p>(4) Method 8260, Gas Chromatography/Mass Spectrometry for Volatile Organics: Capillary Column Technique</p>	Add applicable test methods. Update for permit modifications.
228.	VIII		(NEW) 40 CFR 61.355(h)		<p>Add the following:</p> <p>Applicable Requirement: 40 CFR 61.355(h)</p> <p>Description of Requirement: Test equipment for compliance with no detectable emissions requirements of 40 CFR 61 Subpart FF</p> <p>Acceptable Test Methods: EPA reference method 21 (40 CFR 60, Appendix A), Determination of Volatile Organic Compound Leaks</p>	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
229.	VIII		(NEW) 40 CFR 61.355(i)		<p>Add the following:</p> <p>Applicable Requirement: 40 CFR 61.355(i)</p> <p>Description of Requirement: Demonstrate compliance of a control device with a performance test</p> <p>Acceptable Test Methods: 40 CFR 60, Appendix A, Method 1 or 1A; 40 CFR 60, Appendix A, Method 2, 2A, 2C, or 2D; 40 CFR 60, Appendix A, Method 18</p>	Add applicable test methods. Update for permit modifications.
230.	VIII		(NEW) BAAQMD Condition #1240, Parts II.32d, II.44, II.53, II.86		<p>Add the following:</p> <p>Applicable Requirement: BAAQMD Condition #1240, Parts II.32d, II.44, II.53, II.86</p> <p>Description of Requirement: No detectable fugitive organic emissions > 100 ppmv measured as total organic compounds at vapor recovery system (S24 and A31)</p> <p>Acceptable Test Methods: EPA reference method 21 (40 CFR 60, Appendix A), Determination of Volatile Organic Compound Leaks</p>	Add applicable test methods. Update for permit modifications.

Attachment A
Comments on Sections II, III, IV, VI, VIII, and IX (Continued)

	Permit Location	Sources	Applicable Requirement	Review Comment	Proposed Change	Rationale
231.	IX B-1	S1, S2, S4, S23		<i>Deleted Permit Shield of BAAQMD Condition 1240.II.13 for BAAQMD 8-5 inspections of primary and zero-gap secondary seals in external floating roof tanks.</i>	<p><i>Reinstate the permit shield for BAAQMD 8-5 inspections of primary and zero-gap secondary seals in external floating roof tanks except change as follows to make it applicable to the 10/27/02 version of BAAQMD 8-5:</i></p> <p><i>Subsumed Requirement Citation: BAAQMD 8-5-401.1, 8-5-401.2</i></p> <p><i>Title or Description: Inspection of entire circumference of each primary and secondary seal for compliance with 8-5-321 and 8-5-322 twice per calendar year at 4 to 8 month intervals and any time a seal is installed or repaired (8-5-401.1). Inspection of tank fittings for compliance with 8-5-320 twice per calendar year at 4 to 8 month intervals (8-5-401.2).</i></p> <p><i>Streamlined Requirements: BAAQMD Condition #1240, Part II.13</i></p> <p><i>Title or Description: Quarterly inspection of the primary seals, secondary seals, and fittings including all items required by Regulation 8-5.</i></p>	<i>Deleted Permit Shield of BAAQMD Condition 1240.II.13 for BAAQMD 8-5 inspections of primary and zero-gap secondary seals because the permit condition referenced the shielded citations (as documented in the Statement of Basis). However, the permit condition has now been changed so that the shielded citations are not referenced.</i>
232.	IX-B	Several	Several		<i>Add new Table IX-B Permit Shields for Subsumed Requirements as shown in Attachment G.</i>	<i>Add permit shields for test methods subsumed by the continuous temperature monitoring requirements of BAAQMD Condition 1240.II.58b for S24 and A31 and Condition 1240.I.19 for A4</i>

Attachment B

Comments on Section VII

Attachment B
Comments on Section VII

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
1.	VII – all tables	All			Did not renumber Section VII Tables to correspond to Section IV Tables as requested by Valero.	Renumber tables in Section VII to correspond to Section IV.	The current table numbering in Section VII is confusing because the tables do not correspond to the Section IV tables for the same sources. In addition, there are three different tables in Section VII that are numbered “AI”. Renumbering will correct these problems.
2.	VII - All tables except VII-T	Sitewide and All sources except S30	VOC	BAAQMD Condition 1240, part I.14	Changed facility wide refinery NMHC emissions limits (excluding marine emission) as requested (permit application #7123 – March 2003), but did not update Section VII to match. NMHC was 49.1, now 49.345 tons/yr	Change “49.1 tons/yr” to “49.345 tons/yr” Change monitoring frequency from “P/A” to “P/SA”	Incorporate changes to permit conditions.
3.	VII- Refinery, L, M, N, O, W, AK, AL	Sitewide, S19, S20, S21, S24, S34, A4, A31	NOX	BAAQMD Condition 1240, part I.14	Changed facility wide refinery NOx emissions limit for combustion emissions (excluding marine emission) as requested (permit application #7123 – March 2003), but did not update Section VII to match. NOx was 40, now 40.047 tons/yr	Change “40 tons/yr” to “40.047 tons/yr” for NOx limit Change monitoring frequency from “P/A” to “P/SA”	Incorporate changes to permit conditions.
4.	VII- Refinery, L, M, N, O, W, AK, AL	Sitewide, S19, S20, S21, S24, S34, A4, A31	SO2	BAAQMD Condition 1240, part I.14	Changed facility wide SO2 emissions limit for combustion emissions (excluding marine emission) as requested (permit application #7123 – March 2003), but did not update Section VII to match. SO2 was 28, now 28.049 tons/yr	Change “28 tons/yr” to “28.049 tons/yr”	Incorporate changes to permit conditions.

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
5.	VII - Refinery	Sitewide	NOX	BAAQMD Condition 1240, part I.14		Change the Monitoring Requirement Citation to, "BAAQMD Condition 1240, parts I.18a and I.18j"	Parts I.18h and I.18i are applicable only to specific sources and should not be included as site wide monitoring requirements. Only Conditions 1240 Parts I.18a and I.18j are applicable site wide and are listed in the corresponding table in Section IV.
6.	VII - Refinery	Sitewide	VOC	BAAQMD Condition 1240, part I.14		Change the Monitoring Requirement Citation to, "BAAQMD Condition 1240, parts I.18a and I.18j"	Parts I.18c through I.18g are applicable only to specific sources and should not be included as site wide monitoring requirements. Only Conditions 1240 Parts I.18a and I.18j are applicable site wide and are listed in the corresponding table in Section IV
7.	VII- Refinery	Sitewide	VOC	BAAQMD 8-5-328.1.2		Change FE to "Y" Change "cleaning" to "degassing" in Emission Limit Column Add "BAAQMD" to Monitoring Requirement Citation	BAAQMD 8-5 is SIP approved. Make limit language in permit agree with language in regulation. Add "BAAQMD" for consistency
8.	VII- Refinery	Sitewide			Did not add Monitoring Requirement Citation for BAAQMD 8-5-604 as requested.	Add the following: Type of Limit: VOC Emission Limit Citation: [None] FE Y/N: Y Emission Limit: Determination of applicability Monitoring Requirement Citation: BAAQMD 8-5-604 Monitoring Frequency: P/E Monitoring Type: Table or sample analysis	Add applicable requirement. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
9.	VII-Refinery	Sitewide	VOC	SIP 8-5-328.2		Delete all SIP 8-5 citations	BAAQMD 8-5 is SIP approved and SIP citations are no longer needed.
10.	VII-A, D, F, O, R, AC, AE, AH, AL	S1, S2, S4, S23, S9, S13, S24, S27, S59, S63, S67, A31		All BAAQMD 8-5 citations		Change FE to “Y”	BAAQMD 8-5 is SIP approved.
11.	VII-A, D, F, O, R, AC, AE, AH, AL	S1, S2, S4, S23, S9, S13, S24, S27, S59, S63, S67, A31		All SIP 8-5 citations		Delete all SIP 8-5 limits and monitoring requirements	BAAQMD 8-5 is SIP approved and SIP citations are no longer needed.
12.	VII-A	S1, S2, S4, S23	VOC	BAAQMD 8-5-320		Change Monitoring Requirement Citation to “BAAQMD Condition 1240, Part II.13 and BAAQMD 8-5-401.2”. Change Monitoring Frequency to “P/Q or event basis”	Need to add permit condition because it calls for fitting inspections as well as seal inspections. Need to change BAAQMD 8-5 citation because the current citation [8-5-402.1] is an internal floating roof citation, 8-5-401.2 is the correct citation for monitoring external floating roof fittings. Correct error and omission. Use most stringent monitoring frequency from permit condition II.13 (P/Q or event)
13.	VII-A	S1, S2, S4, S23	VOC	BAAQMD 8-5-321 BAAQMD 8-5-322	Did not delete 8-5-404 from the Monitoring Requirement Citation as requested.	In Monitoring Requirement Citation, delete 8-5-404	8-5-404 should be deleted because it no longer contains inspection criteria as it did in the previous version of BAAQMD 8-5. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
14.	VII-A, D, F, AC, AE	S1, S2, S4, S23, S9, S13, S59, S63	VOC	BAAQMD 8-5-328.1.2		Change Limit to “Organic concentration of < 10,000 ppm as methane after degassing” Change Monitoring Requirement Citation to “BAAQMD 8-5-503”	Clarify that organic concentration is the limit and correct to agree with current regulatory language. Add “BAAQMD” for consistency
15.	VII-A, D, F, AC, AE	S1, S2, S4, S23, S9, S13, S59, S63	VOC	None (BAAQMD 8-5-501 Monitoring Requirement Citation)	Did not change Monitoring Requirement Citation to 8-5-501.1 as requested.	Change Monitoring Requirement Citation to “8-5-501.1”	Correct to match current BAAQMD 8-5 citation number for this requirement. Correct error
16.	VII-A	S1, S2, S4, S23			Did not add Throughput limits for external floating roof tanks as requested.	Add the following: Type of Limit: Throughput Citation of Limit: BAAQMD Condition 1240, Part II.14 FE Y/N: Y Limit: < 6,235,000 barrels in any consecutive 12 month period Monitoring Requirement Citation: BAAQMD Condition 1240, Part II.22 Monitoring Frequency: P/D Monitoring Type: Records Type of Limit: Throughput Citation of Limit: BAAQMD Condition 1240, Part II.14 FE Y/N: Y Limit: < 6,235,000 barrels in any consecutive 12 month period Monitoring Requirement Citation: BAAQMD Condition 1240, Part II.23 Monitoring Frequency: P/M Monitoring Type: Records	Add applicable permit condition requirements for external floating roof tanks. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
17.	VII-A	S1, S2, S4, S23			Did not add Vapor Pressure limits for external floating roof tanks as requested.	<p>Add the following limits:</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD Condition 1240, Part II.16 FE Y/N: Y Limit: TVP shall not exceed 11 psia Monitoring Requirement Citation: BAAQMD Condition 1240, Part II.22 Monitoring Frequency: P/D Monitoring Type: Records</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD Condition 1240, Part II.16 FE Y/N: Y Limit: TVP shall not exceed 11 psia Monitoring Requirement Citation: BAAQMD Condition 1240, Part II.23 Monitoring Frequency: P/M Monitoring Type: Records</p>	Add applicable permit condition requirements for external floating roof tanks. Correct omission
18.	VII-A, D	S1, S2, S4, S23, S9			Did not add VOC Monitoring Requirement for 8-5-501.2, Records of Tank Seal Replacement as requested	<p>Add the following limit:</p> <p>Type of Limit: VOC Citation of Limit: [None] FE Y/N: Y Limit: None Monitoring Requirement Citation: BAAQMD 8-5-501.2 Monitoring Frequency: P/E Monitoring Type: Records of tank seal replacement</p>	Add applicable BAAQMD 8-5 requirement for floating roof tanks. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
19.	VII-D	S9	VOC	BAAQMD 8-5-320.5.2 BAAQMD 8-5-320.5.3 BAAQMD 8-5-320.6	Did not delete limits as requested	Delete these three limits.	Tanks at Asphalt Plant do not have slotted sampling wells (8-5-320.5 limits) or emergency roof drains (8-5-320.6) and are not subject to these requirements. Correct error
20.	VII-D	S9	VOC	BAAQMD 8-5-321.1 BAAQMD 8-5-322.1	Did not delete VOC limits for BAAQMD 8-5-321.1 and BAAQMD 8-5-322.1 as requested Did not add new visual inspection requirement as requested	Delete the two existing VOC limits for BAAQMD 8-5-321.1 and BAAQMD 8-5-322.1. Add the following limit: Type of Limit: VOC Citation of Limit: BAAQMD 8-5-305.1, 8-5-305.2, 8-5-305.3, 8-5-321.1, 8-5-322.1 FE: Y Limit: No visual gaps in primary and secondary seals or viewports in accordance with 8-5-305. No holes, tears or openings in primary or secondary seal fabric. Monitoring Requirement Citation: BAAQMD 8-5-402.2 Frequency: P/SA Monitoring Type: Visual inspection of outer most seal from viewports on fixed roof	Limits to be deleted for 8-5-321.1 and 8-5-322.2 are from previous version of BAAQMD 8-5 and cite an obsolete monitoring requirement citation. They should be replaced with new semi-annual internal floating roof tank visual inspection (8-5-402.2) as stated. Correct error and omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
21.	VII-D	S9	VOC	BAAQMD 8-5-322.3 (2 rows)	Did not delete VOC limits for BAAQMD 8-5-322.3 as requested	Delete the two VOC limits for BAAQMD 8-5-322.3	BAAQMD 8-5-322.3 is not applicable to the internal floating roof tank (S9) at the Asphalt Plant and is not in the associated table in Section IV. The citation is not applicable because the internal floating roof tank has a zero-gap secondary seal and is subject to the more stringent requirements of 8-5-322.5 rather than to the requirements of 8-5-322.3. Correct error
22.	VII-E	S12	VOC	40 CFR 61.349(a)(2)(i)(A)		Consolidate two rows for this limit into one row as follows: Type of Limit: VOC Citation of Limit: 40 CFR 61.349(a)(2)(i)(A) FE Y/N: Y Limit: 95% control (by A31 or S24) Monitoring Requirement Citation: 40 CFR 61.354(c)(1) 40 CFR 61.354(c)(4) Monitoring Frequency: C Monitoring Type: Temperature measurement Delete the second row for this limit.	Consolidate requirements and make consistent with other tables in the permit

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
23.	VII-E, P, Q, R, AH	S12, S25, S28, S26, S27, S67				<p>Add the following limit:</p> <p>Type of Limit: VOC Citation of Limit: 40 CFR 61.343(a)(1)(i)(B) FE Y/N: Y Limit: Tank openings maintained in closed and sealed position Monitoring Requirement Citation: 40 CFR 61.343(c) Monitoring Frequency: P/Q Monitoring Type: Visual inspection</p>	Add 40 CFR 61 Subpart FF quarterly inspection requirements for tank openings. Correct omission
24.	VII-F, R, AC, AE, AH	S13, S27, S59, S63, S67			<p>Did not add VOC limit for BAAQMD 8-5-303.1 (PV valves set pressure) as requested</p> <p>Did not add VOC limit for BAAQMD 8-5-303.2 (PV valves gas tight) as requested</p>	<p>Add the following limits:</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD 8-5-303.1 FE Y/N: Y Limit: PV valve set pressure within 10% of maximum allowable working pressure or at least 25.8 mmHg (0.5 psig) Monitoring Requirement Citation: BAAQMD 8-5-403 Monitoring Frequency: P/SA Monitoring Type: Inspection</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD 8-5-303.2 FE Y/N: Y Limit: Fugitive emissions at PV valves not to exceed 500 ppm Monitoring Requirement Citation: BAAQMD 8-5-403 Monitoring Frequency: P/SA Monitoring Type: Method 21</p>	Add applicable BAAQMD 8-5 requirements for PV valves on fixed roof tanks. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
25.	VII-F, AC, AE	S13, S59, S63				<p>Add the following limit:</p> <p>Type of Limit: VOC Citation of Limit: 40 CFR 60.112b(a)(3)(i) FE Y/N: Y Limit: No detectable emissions from closed vent system > = 500 ppm above background Monitoring Requirement Citation: 40 CFR 60.112b(a)(3)(i) Monitoring Frequency: P/E Monitoring Type: Method 21 as specified by 40 CFR 60.485(b)</p>	Add applicable NSPS Subpart Kb requirement for fixed roof tank closed vent system. Correct omission
26.	VII-G, H	S14, S15				<p>Add the following limit:</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD 8-6-304 FE Y/N: Y Limit: 21 g/cubic meter (0.17 lb/1000 gallons) (control by A4) Monitoring Requirement Citation: BAAQMD Condition 1240, part I.19 Monitoring Frequency: C Monitoring Type: Temperature monitoring</p>	Add applicable requirements. Correct omission
27.	VII-G, H, U	S14, S15, S31				<p>Add the following limit:</p> <p>Type of Limit: VOC Citation of Limit: BAAQMD 8-6-306 FE Y/N: Y Limit: Vapor tight organic liquid delivery and loading equipment Monitoring Requirement Citation: BAAQMD 8-6-502 Monitoring Frequency: P/E Monitoring Type: Portable hydrocarbon detector (EPA Method 21)</p>	Add applicable requirements. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
28.	VII-I	S16				Change title of Table from " S16, TRUCK LOADING RACKS, KEROSENE OR DISTILLATE OIL " to " S16, TRUCK LOADING RACK, HEAVY VACUUM GAS OIL "	Correct title and clarify function of source
29.	VII-I, VII-J	S16, S17				Add the following: Type of Limit: VOC Citation of Limit: BAAQMD 8-6-110 FE Y/N: Y Limit: TVP < 0.5 psia to qualify for 8-6-110 loading and delivery exemption for low vapor pressure organic liquids Monitoring Requirement Citation: BAAQMD 8-6-503 and 8-6-604 Monitoring Frequency: P/E Monitoring Type: TVP Analysis	Add BAAQMD 8-6 exemption and monitoring requirement to correspond to same change in Section IV. Correct omission
30.	VII-K	S18	Through put	BAAQMD Condition #1240, part I.2	Did not add "Y" to FE Y/N as requested by Valero in June 2002 submittal	Add "Y" to FE Y/N Change Monitoring Frequency from "P/M" to "P/D"	Correct errors and omissions.
31.	VII-K, L	S18, S19	VOC	BAAQMD Condition #1240, part I.3	Modified permit condition 1240.I.16 but did not update Section VII to match	Change Monitoring Requirement Citation to "BAAQMD Condition 1240, part I.16b"	Incorporate changes to permit conditions.
32.	VII-L	S19	NOX	BAAQMD Condition 1240, part I.8	Changed S19 NOx average emissions limit (one hour averaging period) from 30 ppm (dry, 3% O2) to 25 ppm (dry, 3% O2) as requested (permit application #7123 – March 2003). Did not update Section VII to match Changed permit condition I.16; did not update Section VII to match.	Change Limit from "30 ppmv" to "25 ppmv" Change Monitoring Requirement Citation to "BAAQMD Condition 1240, part I.16a"	Incorporate changes to permit conditions.
33.	<i>VII-L</i>	<i>S19</i>	<i>NOX</i>	<i>BAAQMD 9-10-301 (first row)</i>		<i>Add " , parts 7 and 8" to BAAQMD Condition #20617 in Monitoring Requirement Citation</i>	<i>Add permit condition parts that call out the semi annual source tests</i>

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
34.	VII-L	S19	NOX	BAAQMD 9-10-301 (second row)		<p>Add “, parts 3 and 11” to BAAQMD Condition #20617 in Monitoring Requirement Citation</p> <p>Change Monitoring Type to: “Emission calculations using fuel gas heating values, emission factors, fuel meter, and O2 meter data; and Records”</p>	<p>Add permit condition parts that call out the emission calculations (part 3) and the records (part 11)</p> <p>Modify monitoring type to match permit condition (See Attachment F)</p>
35.	VII-L	S19	CO	BAAQMD Condition #20617, part 12		Delete this requirement	<p>Delete to correspond to changes requested by Valero for permit condition. See Attachment F for explanation.</p> <p>If limit is NOT deleted, then change Future effective date to “1/1/04”; change Limit to “No limit (limit to be established by 1/1/04)”; Change Monitoring Frequency to “P/D”; and Change Monitoring Type to “Records”.</p>
36.	VII-L	S19	CO	BAAQMD 9-10-305	Changed permit condition I.16; did not update Section VII to match.	Change Monitoring Requirement Citation to “BAAQMD Condition 1240, part I.16a”	Incorporate changes to permit conditions.
37.	VII-L	S19	CO	BAAQMD Condition 1240, part I.5b	<p>Changed S19 CO concentration limit over any one-hour period from 140 ppm (dry, 3% O2) to 50 ppm (dry, 3% O2) and added BACT as a reason for the permit condition as requested (permit application #7123 – March 2003). Did not update Section VII to match</p> <p>Changed permit condition I.16; did not update Section VII to match.</p>	<p>Change Limit from “140 ppmv” to “50 ppmv”.</p> <p>Change Monitoring Requirement Citation to “BAAQMD Condition 1240, part I.16a”</p>	Incorporate changes to permit conditions.

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
38.	VII-L	S19	CO	BAAQMD Condition 1240, part I.5c	Changed S19 CO emissions limit over any one-hour period from 3.4 lb/hr to 1.47 lb/hr and added BACT as a reason for the permit condition as requested (permit application #7123 – March 2003). Did not update Section VII to match Changed permit condition I.16; did not update Section VII to match.	Change Limit from “3.4 lb/hr” to “1.47 lb/hr” Change Monitoring Requirement Citation to “BAAQMD Condition 1240, part I.16a”	Incorporate changes to permit conditions.
39.	VII-L	S19	CO	BAAQMD Condition #20617, part 9		<i>Change Future Effective Date to “1/1/04”</i> <i>Change Limit to “200 ppmv (dry, 3% O2), operating day average or installation of a CO CEM”</i>	<i>Change to correspond to Valero requested changes to permit conditions. See Attachment F for explanation.</i>
40.	VII-L	S19	SO2	BAAQMD Condition 1240, part I.12 (second row with Limit of “fuel gas H2S concentration limited to 10 ppmv, dry, when any vessel is in port”		Correct Citation of Limit: to "BAAQMD Condition 1240, Part III.3"	Correct error. The text of the Limit is from 1240.III.3, not 1240.I.12 as stated in the table.
41.	VII-L	S19	VOC	BAAQMD Condition 1240, part I.3	Changed permit condition I.16; did not update Section VII to match.	Change Monitoring Requirement Citation to “BAAQMD Condition 1240, part I.16b”	Incorporate changes to permit conditions.
42.	VII-L, M, N, O, W, AK, AL	S19, S20, S21, S24, S34, A4, A31	Through put	BAAQMD Condition 1240, part I.5	Changed maximum heat input to all combustion units except S68 from 86.6 to 93.6 MMBTU/hr as requested (permit application #7123 – March 2003). Did not update Section VII to match	Change Limit from “Maximum heat input to all refinery combustion units < 86.6 MMBTU/hr” to “Maximum heat input to all Asphalt Plant combustion units < 93.6 MMBTU/hr”	Incorporate changes to permit conditions for heat input. Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery.

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
43.	VII-L, M, N	S19, S20, S21	CO	BAAQMD 9-10-305		Change FE Y/N to “Y”	Current version of BAAQMD 9-10 is fully SIP approved per 67 FR 62385.
44.	VII-L, M, N	S19, S20, S21	NOX	BAAQMD 9-10-301 (2 rows)		Change FE Y/N to “Y” in both rows	Current version of BAAQMD 9-10 is fully SIP approved per 67 FR 62385.
45.	VII-L, M, N	S19, S20, S21	NOX	SIP 9-10-303		Delete all SIP 9-10 monitoring requirements	Current version of BAAQMD 9-10 is fully SIP approved per 67 FR 62385.
46.	<i>VII-L, M, N</i>	<i>S19, S20, S21</i>	<i>Throughput</i>	<i>BAAQMD Condition 19329, part 1</i>		<i>Change Citation of Limit to: “Table IIA”</i>	<i>Change to correspond to requested changes to permit conditions (See Attachment F for explanation).</i>
47.	<i>VII-M, N</i>	<i>S20, S21</i>	<i>NOX</i>	<i>9-10-301, second row</i>		<i>Add “and BAAQMD Condition 20617, part 3” to Monitoring Requirement Citation</i> <i>Change Monitoring Type to “Emission calculations using fuel gas heating values, emission factors, fuel meter, and O2 meter data”</i>	<i>Add appropriate part of BAAQMD Condition 20617 and associated monitoring requirements.</i>
48.	VII-M, N	S20, S21	O2	None (BAAQMD 9-10-502 Monitoring Requirement Citation)		Change Monitoring Requirement Citation to “BAAQMD Condition 1240, Part I.10” Change Monitoring Frequency to “C” Change Monitoring Type to “Oxygen analyzer”	Incorporate correct O2 limit for the source. Correct error and omission
49.	<i>VII-M</i>	<i>S20</i>	<i>CO</i>	<i>BAAQMD 9-10-305</i>	<i>Did not add “operating day average” to Limit column as requested by Valero in June 2002 submittal</i>	<i>Add “operating day average” to Limit column</i> <i>Add “and Condition 20617, part 13” to Monitoring Requirement Citation</i>	<i>Correct omission and add applicable permit condition</i>
50.	VII-O, AL	S24, A31	VOC	BAAQMD 8-5-306		Change Limit to “95% control of organic vapors (from S13, S27, S59, S63, S67)”	Clarify limit and abated sources

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
51.	VII-O, AL	S24, A31	VOC	40 CFR 60.112b(a)(3)(ii)		Change Limit to “95% control of organic vapors (from S13, S59, S63)”	Clarify limit and abated sources
52.	VII-O, AL	S24, A31	VOC	40 CFR 61.349(a)(2)(i)(A)		Change Limit to “95% reduction of organic vapors (from S12, S25-S28, S41, S66, S67)”	Clarify limit and abated sources
53.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.32a, b, c		Change Limit to “98.5% destruction of vapors by weight (from S13, S59, S63)”	Clarify limit and abated sources
54.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.43		Change Limit to “98.5% destruction of vapors by weight (from S3)”	Clarify limit and abated sources
55.	VII-O	S24	VOC	BAAQMD Condition 1240, part II.44		Change Citation of Limit to “BAAQMD Condition 1240, parts II.32d, II.44, II.53, II.86” Change Limit to “Fugitive emissions at vapor recovery systems of S63, S3, S65, S66 (S24 or A31) shall not exceed 100 ppmv” Change Monitoring Requirement Citation to “BAAQMD Condition 1240, parts II.32d, II.44, II.53, II.86”	Add all applicable requirements. Correct omission. Clarify limit and abated sources.
56.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.55		Change Limit to “98.5% destruction of vapors by weight (from S5-8, S37, S38, S70)”	Clarify limit and abated sources
57.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.56		Change Limit to “98.5% destruction of vapors by weight (from S51-53, S60, S65)”	Clarify limit and abated sources

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
58.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.57		Change Limit to “98.5% destruction of vapors by weight (from S61, S62)”	Clarify limit and abated sources
59.	VII-O, AL	S24, A31	VOC	BAAQMD Condition 1240, part II.85		Change Limit to “98.5% destruction of vapors by weight (from S66)”	Clarify limit and abated sources
60.	VII-O	S24				<p>Add the following Limit: Type of Limit: VOC Citation of Limit: BAAQMD Condition 1240, part II.70 FE Y/N: Y Limit: 98.5% destruction of vapors by weight (from S54) Monitoring Requirement Citation: BAAQMD Condition 1240, part II.58b Monitoring Frequency: C Monitoring Type: Temperature monitoring</p> <p>Type of Limit: NOX Citation of Limit: BAAQMD 9-10-306.2 FE Y/N: Y Limit: Small unit tune-up requirements Monitoring Requirement Citation: BAAQMD 9-10-504.2 Monitoring Frequency: P/A Monitoring Type: Records</p>	Add all applicable requirements. Correct omission and update for permit modifications

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
61.	VII-O, AL	S24, A31				<p>Add the following Limits: Type of Limit: VOC Citation of Limit: 8-8-307.2 FE Y/N: Y Limit: > 70% combined collection and destruction efficiency by weight (from S41) Monitoring Requirement Citation: BAAQMD Condition 1240, part II.58b Monitoring Frequency: C Monitoring Type: Temperature monitoring</p> <p>Type of Limit: VOC Citation of Limit: 8-8-301.3 FE Y/N: Y Limit: 95% combined collection and destruction efficiency (from S66) Monitoring Requirement Citation: BAAQMD Condition 1240, part II.58b Monitoring Frequency: C Monitoring Type: Temperature monitoring</p>	Add all applicable requirements. Correct omissions and update for permit modifications
62.	VII-O, AL	S24, A31	VOC			<p>Add the following limit: Type of Limit: VOC Citation of Limit: 40 CFR 61.349(f) FE Y/N: Y Limit: Visual inspection of closed vent system and control device Monitoring Requirement Citation: 40 CFR 61.349(f) Monitoring Frequency: P/Q Monitoring Type: Visual inspection</p>	Add applicable limits. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
63.	VII-O, W, AK, AL	S24, S34, A4, A31	Through put	BAAQMD Condition 1240, part I.5		Change the following: Monitoring Frequency: “P/D” Monitoring Type: “PG&E fuel meter”	Small combustion source throughput is monitored using the PG&E fuel meter bill and calculating a daily throughput. Only the large combustion sources (S19, S20, S21) will monitor throughput continuously using the new fuel meter.
64.	VII-P, Z, AG	S25, S28, S41, S66				Add the following limit: Type of Limit: VOC Citation of Limit: 40 CFR 61.349(a)(1)(ii)(B) FE: Y Limit: Car-sealed valves on bypass lines closed Monitoring Requirement Citation: 40 CFR 61.354(f)(1) Frequency: P/M Monitoring Type: Visual inspection	Add applicable 40 CFR 61 Subpart FF requirements for car-sealed valves on tank bypass lines. Correct omission
65.	VII-Q, R	S26, S27	N/A	N/A		Change Title of tables to correspond with Section IV as follows: Table VII-Q S26, Wastewater Tank, Abated by Carbon or Thermal Oxidizer or Process Heater Table VII-R S27, Recovered Oil Tank – TK-12A, Abated by Carbon or Thermal Oxidizer or Process Heater	Consistency and clarification

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
66.	VII-Q, R	S26, S27				Add the following limits: Type of Limit: VOC Citation of Limit: 40 CFR 61.349(a)(2)(i)(A) FE Y/N: Y Limit: 95% control (by A31 or S24) Monitoring Requirement Citation: 40 CFR 61.354(c)(1) 40 CFR 61.354(c)(4) Monitoring Frequency: C Monitoring Type: Temperature measurement	Add 40 CFR 61 Subpart FF monitoring requirements for tanks and for A31 and S24 control. Correct omission
67.	VII-R	S27	VOC	40 CFR 61.349(a)(1)(i)	Did not delete requirement for fugitive VOC limit as requested by Valero in June 2002 submittal	Delete VOC limit for 40 CFR 61.349(a)(1)(i)	Limit is in fugitive components table (VII-AJ). All other fugitive emissions limits removed from source Table VII's because the limits are in the fugitives table. Correct error
68.	VII-R	S27	VOC	40 CFR 61.349(a)(1)(ii)(B)	Did not change frequency from "P/Q" to "P/M" as requested	Change Monitoring Frequency from "P/Q" to "P/M"	Correct error.
69.	VII-R, AH	S27, S67			Did not add BAAQMD 8-5-501.1 recordkeeping requirement as requested	Add the following limit: Type of Limit: [None] Citation of Limit: [None] FE: Y Limit: None Monitoring Requirement Citation: BAAQMD 8-5-501.1 Monitoring Frequency: P/E Monitoring Type: Records of liquids stored and TVPs	Add applicable limit and make these tank tables consistent with other tanks subject to BAAQMD 8-5. Correct omission
70.	VII-U	S31	N/A	N/A		Change Title of Table to "S31, Rail Car Gas Oil and Asphalt Loading Rack"	Correct error and make consistent with Table IIA and Section IV

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
71.	VII-U	S31	VOC	BAAQMD Condition 1240, Part II.32		Change Citation of Limit from “BAAQMD Condition 1240, Part II.32” to “BAAQMD Condition 1240, Part II.66”	Correct error
72.	<i>VII-V</i>	S32	<i>N/A</i>	<i>N/A</i>		<i>Delete Table VII-V in its entirety</i>	<i>S32 no longer exists and has been physically removed from the Asphalt Plant.</i>
73.	VII-X, Y	S39, S40	HAP			Type of Limit: HAP Citation of Limit: 40 CFR 63.641 FE: Y Limit: Retain weight percent total organic HAP in liquid stored for Group 2 determination Monitoring Requirement Citation: 40 CFR 63.654(i)(1)(iv) Monitoring Frequency: P/E Monitoring Type: Records	Tanks are MACT Group 2 storage vessels and are subject to MACT Recordkeeping requirements. Correct omission
74.	VII-Z	S41	VOC	BAAQMD 8-8-307.2		Add “(by S24 or A31)” at the end of the Limit statement	Identify abatement device and make limit statement consistent with other limits.
75.	VII-Z, AH	S41, S67	VOC	40 CFR 61.349(a)(2)(i) (A)		Add the following citation to the Monitoring Requirement Citation: “61.354(c)(4)”	Add the citation calling for monitoring of the thermal oxidizer A31. Correct omission.
76.	VII-Z, AG	S41, S66				Add the following limit: Type of Limit: VOC Citation of Limit: BAAQMD 8-8-114 FE Y/N: Y Exemption for Bypassed Oil-Water Separator or Air Flotation Unit Influent Monitoring Requirement Citation: BAAQMD 8-8-501, and 8-8-601 Monitoring Frequency: P/E Monitoring Type: Records and sample analysis	Add records and critical OC analysis requirements for BAAQMD 8-8-114 OWS and Air Flotation influent bypass exemption. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
77.	VII-Z, AG	S41, S66				Add the following limit: Type of Limit: VOC Citation of Limit: 40 CFR 61.347(a)(1)(i)(B) FE Y/N: Y OWS openings maintained in closed and sealed position Monitoring Requirement Citation: 40 CFR 61.347(b) Monitoring Frequency: P/Q Monitoring Type: Visual inspection	Add quarterly inspection requirements for OWS openings. Correct omission
78.	VII-AC, AE	S59, S63	Through put	BAAQMD Condition #1240, part I.33a	Did not add "Y" to FE Y/N as requested by Valero in June 2002 submittal	Add "Y" to FE Y/N	Correct errors and omissions.
79.	VII-AC, AE	S59, S63				Add the following limit: Type of Limit: VOC Citation of Limit: 40 CFR 60.112b(a)(3)(ii) FE Y/N: Y Limit: 95% control of inlet VOC (by A31 or S24) Monitoring Requirement Citation: BAAQMD Condition 1240, part II.58b Monitoring Frequency: C Monitoring Type: Temperature monitoring	Add requirement from NSPS Kb for VOC control. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
80.	VII-AE	S63				Add the following limit: Type of Limit: VOC Citation of Limit: BAAQMD Condition #1240, part II.32d FE Y/N: Y Limit: Fugitive emissions at vapor recovery system (S24 or A31) shall not exceed 100 ppm Monitoring Requirement Citation: BAAQMD Condition #1240, part II.32d Monitoring Frequency: P/Q or A Monitoring Type: Method 21	Correct omission. Add all applicable requirements.
81.	VII-AF	S65	VOC	BAAQMD Condition #1240, Part II.53		Change Limit to “Fugitive emissions at vapor recovery system (S24 or A31) shall not exceed 100 ppm”	Correct limit and make consistent with similar limits in permit
82.	VII-AF	S65	N/A	N/A		Change title of table to “S65, Asphalt Storage Tank”	Change to correspond to Section IV table for source
83.	VII-AG	S66	VOC	BAAQMD 8-8-301.3	Did not Change FE Y/N to “Y” as requested	Change FE Y/N to “Y”	Correct omission
84.	VII-AG	S66	VOC	40 CFR 61.349(a)	Did not Change Limit citation to “40 CFR 61.349(a)(2)(i)(A)” as requested	Change Citation of Limit to “40 CFR 61.349(a)(2)(i)(A)” Add the following citation to the Monitoring Requirement Citation: 61.354(c)(4)	Correct error Add the citation calling for monitoring of the thermal oxidizer A31. Correct omission.
85.	VII-AG	S66	VOC	BAAQMD Condition 1240, part II.85	Did not add “(control by A31 or S24)” to Limit as requested	Add “(control by A31 or S24)” to Limit	Correct error
86.	VII-AG	S66	VOC	BAAQMD Condition 1240, part II.86	Did not add Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type as requested.	Change the following: Monitoring Requirement Citation: BAAQMD Condition #1240, part II.86 Monitoring Frequency: P/Q or A Monitoring Type: Method 21	Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
87.	VII-AG	S66	Through put	BAAQMD Condition 1240, part II.83	Did not correct throughput limit to “110,376,000 gallons/yr” as requested	Change Limit to “110,376,000 gallons/yr”	Correct error
88.	VII-AI	S68	SO2	BAAQMD Condition 18796, Part 1	Did not change FE Y/N to “Y” as requested	Change FE Y/N to “Y”	Correct error
89.	VII-AI, AI	S69, S70		BAAQMD Condition 20278, Part 4a		Delete BAAQMD Permit Condition 20278, Part 4a	This condition is identical to BAAQMD 6-301 (Ringelmann No. 1 for no more than 3 minutes in any hour.) If it cannot be eliminated, then add the following for S69 only: Monitoring Requirement Citation: BAAQMD Condition 20278, parts 6d and 7 Monitoring Frequency: P/A Monitoring Type: visible emissions inspection
90.	VII-AJ	Components	VOC	SIP 8-28-301		Add “SIP” to Monitoring Requirement Citation	Clarify source of monitoring requirement
91.	VII-AJ	Components	VOC	BAAQMD 8-28-303.2		Add “BAAQMD” to Monitoring Requirement Citation	Clarify source of monitoring requirement
92.	VII-AJ	Components	VOC	BAAQMD 8-28-304.2		Change the following: Monitoring Requirement Citation: BAAQMD 8-28-602 Monitoring Frequency: P/A Monitoring Type: Source test	Add applicable monitoring requirement citation for 95% control efficiency of vapor recovery system required by 8-28-304.2. Correct omission
93.	VII-AJ	Components	VOC	60.482-4(a)		Insert correct mathematical symbols in the Limit. Should be <= (less than or equal to)	Correct error
94.	VII-AJ	Components	NMHC	BAAQMD Condition 1240, part I.14		Change Type of Limit to “VOC” Insert header row above this limit as follows: BAAQMD Permit Conditions	Change Type of Limit for consistency with rest of permit Insert header row for clarity

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
95.	VII-AJ	Components	VOC	40 CFR 61; Subpart FF (Benzene Waste NESHA) 63.345(a)(1)(i)		Correct Citation of Limit to: "61.345(a)(1)(i)" Correct Monitoring Requirement Citation to: "61.345(a)(1)(i)"	Correct error
96.	VII-AJ	Components	N/A	Footnotes		Change title to "Footnotes to Table VII-AJ" (or correct title after renumbering tables) In footnotes b and c, change "refinery" to "Asphalt Plant"	Correct table number error. Distinguish between Valero Benicia Asphalt Plant and Valero Benicia Refinery
97.	VII-AK	A4	VOC	BAAQMD Condition #1240, Part II.60		Add "(from S14)" to limit	Clarify source to be abated
98.	VII-AK	A4	VOC	BAAQMD Condition #1240, Part II.63		Delete "by" and Add "(from S15)" to limit	Clarify source to be abated
99.	VII-AK	A4	VOC	BAAQMD Condition #1240, Part II.68		Add "(from S17)" to limit	Clarify source to be abated
100.	VII-AL	A31	VOC			Add the following Limit: Type of Limit: VOC Citation of Limit: BAAQMD Condition 1240, parts II.32d, II.44, II.53, II.86 FE Y/N: Y Limit: Fugitive emissions at vapor recovery systems of S63, S3, S65, S66 (S24 or A31) shall not exceed 100 ppmv Monitoring Requirement Citation: BAAQMD Condition 1240, parts II.32d, II.44, II.53, II.86 Monitoring Frequency: P/Q or A Monitoring Type: Method 21	Add all applicable requirements. Correct omission

Attachment B
Comments on Section VII (continued)

	Permit Location	Sources	Limit Type	Limit Citation	Review Comment	Proposed Change	Rationale
101.	VII-AL	A31	VOC	BAAQMD Condition 1240, part II.69		Change Limit to “98.5% destruction of vapors by weight (from S31)”	Clarify limit and abated sources
102.	VII-AL	A31	VOC	BAAQMD Condition 1240, part II.70		Change Limit to “98.5% destruction of vapors by weight (from S54)”	Clarify limit and abated sources

Attachment C

Modifications to Table IIB – Abatement Devices

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A1	Koch Mist Eliminator (F8)	S5-S8, S25, S41, S59, S66	None	None	None
A2	Mist Eliminator (F-9)	S17	None	None	None
A3	Mist Eliminator (F-10)	S3, S5-S8, S13, S25, S37, S38, S41, S51- S54, S59, S60-S63, S65, S66, S70	None	None	None
A4	Thermal Oxidizer (6.5 MMbtu/hr)	S14, S15, S17, A2	BAAQMD Condition #1240, Part I.14	temperature	Emissions of NMHC < 49.345 tons per year excluding marine emissions
		S14, S15	BAAQMD 8-6-301	Temperature	0.17 pounds organic compounds per 1,000 gallons
		S14	BAAQMD Condition #1240, Part II.60	Temperature	98.5% destruction
		S15	BAAQMD Condition #1240, Part II.63	Temperature	98.5% destruction
		S17	BAAQMD 6-301	Temperature	Ringelmann No. 1 for no more than 3 minutes in any hour
		S17	BAAQMD 6-310	Temperature	0.15 gr/dscf
		S17	BAAQMD Condition #1240, Part II.68	Temperature	98.5% destruction

Table II B – Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A6	Mist Eliminator	S31	None	None	None
A20	Mist Eliminator F500	S3, S13, S37, S38, S51-S53, S54, S60- S63, S65, S70	None	None	None
A21	Carbon Canister	S27	40 CFR 61.349(a)(2) (ii)	None	95% control of VOC or 98% control of benzene
A22	Carbon Canister	S27	40 CFR 61.349(a)(2) (ii)	None	95% control of VOC or 98% control of benzene
A23	Carbon Canister	S26	40 CFR 61.349(a)(2) (ii)	None	95% control of VOC or 98% control of benzene
A24	Carbon Canister	S26	40 CFR 61.349(a)(2) (ii)	None	95% control of VOC or 98% control of benzene

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

A31	Thermal Oxidizer (3.5 MMbtu/hr)	S3, S5-S8, S12, S13, S25, S28, S31, S37, S38, S41, S51-S54, S59, S60-S63, S65, S66, S67, S70, A1, A3, A6, A20	BAAQMD Condition #1240, Part I.14	temperature	Emissions of NMHC < 49.345 tons per year excluding marine emissions
			BAAQMD Condition #1240, Part	Temperature	98.5% destruction
		S3	II.43		
		S5-8, S37, S38, S70	II.55		
		S13	II.32a		
		S31	II.69		
		S51-53, S60, S65	II.56		
		S54	II.70		
		S59	II.32b		
		S61,62	II.57		
		S63	II.32c		
		S66	II.85		

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

		S5-S8, S31, S37, S38, S51- S54, S60- S62, S65, S70	BAAQMD 6-301	Temperature	Ringelmann No. 1 for no more than 3 minutes in any hour
		S5-S8, S31, S37, S38, S51- S54, S60- S62, S65, S70	BAAQMD 6-310	Temperature	0.15 gr/dscf
		S5-S8, S37, S38, S51-S53, S60-S62, S65, S70	40 CFR 60.473(c)	temperature	0 percent opacity except for one consecutive 15-min period in any 24-hr period for cleaning
		S12, S25- S28, S41, S66, S67	40 CFR 61.349(a) (2)(i)(A)	temperature	95% control of inlet VOC
		S13, S59, S63	BAAQMD 8-5-306	Temperature	95% control of VOC
		S13, S59, S63	40 CFR 60.112b(a) (3)(ii)	Temperature	95% control of inlet VOC

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

		S31	BAAQMD 8-6-301	Temperature	0.17 pounds organic compounds per 1,000 gallons
		S41	BAAQMD 8-8-307.2	Temperature	70% combined collection and destruction efficiency
		S66	BAAQMD 8-8-301.3	Temperature	95% combined collection and destruction efficiency

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

A44	Off Gas Caustic Scrubber	S18	None	None	None
A45	Off Gas Caustic Scrubber	A44	BAAQMD Condition 1240, Part I.11	None	H2S concentration < 163 ppmv, dry, 3 hour average
A45	Off Gas Caustic Scrubber	A44	BAAQMD Condition 1240, Part I.12	None	H2S concentration < 10 ppmv, dry, 24 hour average
S19	Vacuum Heater (natural gas, Asphalt Plant fuel gas)	S18 A44, A45	BAAQMD Condition #1240, Part I.14	None	Emissions of NMHC < 49.345 tons per year excluding marine emissions
		S18	BAAQMD Condition #1240, Part I.3	None	98.5% destruction
		S18	40 CFR 63.643(a)(2)	None	98% destruction of organic HAPs or concentration of 20 ppmv, @ 3% O ₂ , dry

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

S24	Hot Oil Heater	S3, S5-S8, S12, S13, S25, S28, S37, S38, S41, S51-S53, S54, S59, S60-S62, S63, S65, S66, S67, S70, A1, A3, A20	BAAQMD Condition #1240, Part I.14	temperature	Emissions of NMHC < 49.345 tons per year excluding marine emissions
			BAAQMD Condition #1240, Part	Temperature	98.5% destruction
		S3	II.43		
		S5-8, S37, S38, S70	II.55		
		S13	II.32a		
		S51-S53, S60, S65	II.56		
		S54	II.70		
		S59	II.32b		
		S61,62	II.57		
		S63	II.32c		
		S66	II.85		
		S5-S8, S37, S38, S51-S54, S60-S62, S65, S70	BAAQMD 6-301	Temperature	Ringelmann No. 1 for no more than 3 minutes in any hour

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

		S5-S8, S37, S38, S51-S54, S60-S62, S65, S70	BAAQMD 6-310	Temperature	0.15 gr/dscf
		S5-S8, S37, S38, S51-S53, S60-S62, S65, S70	40 CFR 60.473(c)	Temperature	0 percent opacity except for one consecutive 15-min period in any 24-hr period for cleaning
		S12, S25- S28, S41, S66, S67	40 CFR 61.349(a) (2)(i)(A)	Temperature	95% control of inlet VOC
		S13, S59, S63	BAAQMD 8-5-306	Temperature	95% control of VOC
		S13, S59, S63	40 CFR 60.112b(a) (3)(ii)	Temperature	95% control of inlet VOC
		S41	BAAQMD 8-8-307.2	Temperature	70% combined collection and destruction efficiency
		S66	BAAQMD 8-8-301.3	Temperature	95% combined collection and destruction efficiency

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

Attachment C - Modifications to Table IIB - Abatement Devices (continued)

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Attachment D

Modifications to Table IV-A 40 CFR 63 Subpart A

Table IV - A
General Refinery Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Rationale for Change
40 CFR 63 Subpart A	General Provisions of MACT Standards (03/16/1994)		
63.1(a)(1)	Terms used throughout this part are defined in section 63.2	Y	
63.1(a)(2)	This part contains NESHAPS pursuant to Section 112 of Federal Clean Air Act. These NESHAPS are independent of NESHAPS in 40 CFR 61.	Y	
63.1(a)(3)	Emission standard in this part does not replace a more stringent standard in another rule.	Y	
63.1(a)(6)	Availability of information	Y	<i>Citation is applicable</i>
63.1(a)(11)	Submittal postmarked within required timeframe is sufficient.	Y	
63.1(a)(12)	Time periods may be extended if mutually agreed upon, as allowed under 63.9(i)	Y	
			Deleted from revised regulation.
			Deleted from revised regulation.
			Reserved in revised regulation.
			Reserved in revised regulation.
			<i>Not applicable because refinery is not an area source</i>
63.2	Definitions	Y	
63.4(a)(1)	Sources may not operate in violation, unless an extension or exemption has been obtained	Y	
63.4(a)(2)	Recordkeeping and reporting requirements must be met	Y	
			Reserved in revised regulation.
			Reserved in revised regulation.
63.4(b)	Circumvention	Y	
63.4(c)	Fragmentation	Y	<i>Title changed in revised regulation</i>
			<i>Just a title</i>
63.5(a)(1)	Construction and Reconstruction applicability	Y	
63.5(a)(2)	Construction and Reconstruction-effective date	Y	
63.5(b)(1)	Upon construction or reconstruction, subject to standards for new sources	Y	
63.5(b)(3)	Prior written approval of administrator required before constructing or reconstructing	Y	
63.5(b)(4)	Construction and Reconstruction-notification to administrator	Y	

Attachment D - Modifications to Table IV-A for 40 CFR 63 Subpart A (continued)

			Reserved in revised regulation.
63.5(b)(6)	Equipment added to affected source becomes part of affected source, and is subject to relevant standards for source	Y	
63.5(d)(1)(i)	Application for approval of construction or reconstruction	Y	<i>Title is more appropriate for this citation</i>
63.5(d)(1)(ii)	Separate applications for each construction or reconstruction	Y	
63.5(d)(3)	Application for approval of reconstruction	Y	<i>Title changed in revised regulation</i>
63.5(d)(4)	Additional information	Y	
63.5(e)	Approval of construction or reconstruction	Y	
63.5(f)(1)	Approval of construction or reconstruction based on prior state pre-construction review	Y	<i>Title changed in revised regulation</i>
63.5(f)(2)	Construction and Reconstruction-submittal of request to Administrator	Y	
63.6(a)	Compliance with Standards and Maintenance Requirements-applicability	Y	
63.6(b)(3)	Compliance date for sources constructed between proposal and promulgation date for standard	Y	
		Y	<i>Not applicable because refinery is not an area source</i>
63.6(e)	Operation and Maintenance Requirements	Y	
63.6(f)(1)	Compliance with non-opacity emission standards - applicability	Y	
63.6(f)(2)(i)	Determination of compliance with non-opacity standard based on performance tests	Y	
63.6(f)(2)(ii)	Determination of compliance with non-opacity standard based on based on conformance with operation and maintenance requirements	Y	
63.6(f)(2)(iii)	Use of startup tests for state requirements	Y	
63.6(f)(2)(iii)(A)	Tests within reasonable time	Y	
63.6(f)(2)(iii)(B)	Tests conducted under representative operating conditions	Y	
63.6(f)(2)(iii)(C)	Use of EPA-approved test procedures	Y	
63.6(f)(2)(iv)	Determine compliance by reviewing records, inspections	Y	
63.6(f)(2)(v)	Determine compliance by evaluation of conformance with operation and maintenance requirements	Y	
63.6(f)(3)	Finding of compliance	Y	
63.6(g)	Use of alternative non-opacity emission standard	Y	
63.6(h)(1)	Compliance with opacity and visible emissions standards-Applicability	Y	
63.6(h)(2)	Methods for determining compliance	Y	
63.6(h)(6)	Availability of records	Y	
63.6(i)	Extension of compliance with emission standards	Y	

Attachment D - Modifications to Table IV-A for 40 CFR 63 Subpart A (continued)

63.6(j)	Exemption from compliance with emission standard	Y	
63.7(a)(3)	Administrator may require a performance test	Y	
63.7(d)	Performance testing facilities.	Y	
63.7(e)(1)	Performance Testing Requirements-conduct of performance tests	Y	
63.7(e)(2)	Performance Testing Requirements-use of test methods and procedures in 40 CFR 51, 60, 61, or 63	Y	
63.7(e)(4)	Testing under Section 114 of the Clean Air Act	Y	
63.7(h)(1)	Waiver of performance tests	Y	
63.7(h)(2)	Application for waiver of individual performance test	Y	
63.7(h)(3)	Request to waive a performance test	Y	
63.7(h)(5)	Administrator's authority not abrogated	Y	
63.8(b)(1)	Conducting monitoring	Y	
63.8(b)(3)	Using more than one monitoring system to measure emissions.	Y	
63.8(c)(1)	Monitoring Requirements	Y	
63.8(c)(1)(i)	Permit holder shall keep necessary parts to repair "routine" malfunctions, as identified in malfunction plan, per 63.6(e)(3)	Y	
63.8(c)(1)(iii)	Applicable operation and maintenance procedures	Y	
63.8(c)(2)	Monitoring systems shall measure representative emissions, parameters.	Y	NO CHANGE
63.8(c)(3)	Monitors shall be installed prior to, or in conjunction with, performance tests under 63.7	Y	
63.8(f)(1)	Use of alternative monitoring method	Y	
63.8(f)(2)	Administrator may approve alternative monitoring upon written request	Y	
63.8(f)(3)	If administrator has reasonable grounds to dispute results of alternative monitoring, the administrator may require specific monitoring	Y	
63.8(f)(4)(ii)	Requirements for application for alternative monitoring	Y	
63.8(f)(4)(iv)	Requirements for application for minor changes	Y	New citation in revised regulation
63.8(f)(5)(i)	Notification of approval of alternative monitoring	Y	
63.8(f)(5)(ii)	Administrator may establish procedures and criteria	Y	Revised citation in revised regulation
63.8(f)(5)(iii)	Use of alternative monitoring until Administrator approves other monitoring	Y	
63.9(a)	Notification requirements – applicability and general information	Y	
63.9(b)(4)	Notification Requirements for new or reconstructed source with initial startup date after effective date of relevant standard	Y	
63.9(b)(5)	Notification Requirements for construction of new source or reconstruction of existing source subject to standard	Y	
63.9(c)	Request for extension of compliance	Y	
63.9(d)	Notification that source is subject to special compliance requirements	Y	
63.9(i)	Adjustments to time periods or postmark deadlines for submittal and review of required communications	Y	
63.10(a)	Recordkeeping and reporting - applicability and general information.	Y	

Attachment D - Modifications to Table IV-A for 40 CFR 63 Subpart A (continued)

63.10(b)(2)(i)	Records of startup, shutdown, or malfunction of operation.	Y	
63.10(b)(2)(ii)	Records of malfunction of air pollution control equipment	Y	
63.10(b)(2)(iv)	Record of actions deviating from startup, shutdown, and malfunction plan.	Y	
63.10(b)(2)(v)	Records to determine conformance with startup, shutdown, and malfunction plan.	Y	
63.10(b)(2)(x)	Records of monitoring system calibration checks.	Y	
63.10(b)(2)(xi)	Records of monitoring system adjustments and maintenance.	Y	<i>Revised citation in revised regulation</i>
63.10(d)(4)	Progress reports for extension of compliance	Y	
63.10(d)(5)(i)	Periodic startup, shutdown, and malfunction reports.	Y	
63.10(d)(5)(ii)	Immediate startup, shutdown, and malfunction reports.	Y	
63.10(f)	Waiver of recordkeeping and reporting requirements	Y	
63.11	Control Device Requirements	Y	
63.12	State Authority and Delegation	Y	
63.13	Addresses of EPA Regional Office	Y	
63.14	Incorporation by Reference	Y	
63.15	Availability of Information and Confidentiality	Y	

Attachment E

WSPA Comments

**Proposed Refinery NOx Box Permit Conditions
(not enclosed with electronic file)**

Attachment F

Valero Comments

Proposed Asphalt Plant NOx Box Permit Conditions

Attachment F

Valero Comments on Proposed Asphalt Plant NOx Box Permit Conditions

Valero supports WSPA comments on the BAAQMD's Revised Compliance Monitoring Policy and Draft Permit Condition Template for Regulation 9 Rule 10 ("Nitrogen Oxides and Carbon Monoxide from Boilers, Steam Generators and Process Heaters in Petroleum Refineries"), set forth in Attachment E. In addition, Valero has specific comments and suggestions on the draft permit conditions for the Benicia Asphalt Plant to ensure refinery-wide NOx compliance, as discussed below.

The Valero Benicia Refinery, which includes both the fuels refinery (formerly the ExxonMobil Refinery) and adjacent asphalt plant (formerly Huntway Refining), utilizes NOx IERC's approved for use under the Alternate Compliance Plan (ACP) provisions of Regulation 2 Rule 9 to assure compliance with the refinery-wide NOx limit under Regulation 9 Rule 10. Accordingly, Valero's proposed permit conditions reference the use of NOx IERC's as an integral part of the NOx compliance strategy for the asphalt plant.

Below are Valero's comments and proposed revisions to particular terms of the proposed permit conditions. The original text of the proposed permit conditions is set forth below in underlined text (example); proposed deletions are indicated in strikethrough text (~~example~~); proposed additions are indicated in italicized text (*example*); and each section is followed by a discussion in bold text (**example**).

Condition# 19329

For Sources S19, Vacuum Heater; S20, S21, Steam Boilers

Conditions will be imposed on all of the sources in the NOx *Alternate* Compliance Plan to limit the maximum firing rates to the numbers presented in *Table IIA – Permitted Sources in the respective Title V permits for Valero Refining Company (Plant # B2626) and Valero Asphalt Plant (Plant # B3193).* ~~the Plan. For those sources in Phase I, the added condition will read as follows:~~

Table IIA – Permitted Sources in both Title V permits provides a single, consistent reference for fired duty limits for each facility. References to Phase I sources are no longer necessary, because both Phases I and II of the ACP are complete.

*1. The *following* affected sources making up this Alternative Compliance Plan shall not exceed the ~~following~~ maximum hourly firing rates *listed in Table IIA – Permitted Sources in their respective Title V permits*: (Basis: Regulation 2-9-303.4.1, Cumulative Increase)

Valero Refining Company (Plant # B2626)

S-7 Pipestill Hydrofiner Furnace: F-103, ~~53 MMBtu/Hr~~

S-20 Naphtha Hydrofiner Furnace: F-104, ~~62 MMBtu/Hr~~

S-21 Hydrogen Reforming Furnace: F-301, 614 MMBtu/Hr
S-22 Hydrogen Reforming Furnace: F-351, 614 MMBtu/Hr
S-23 HCU Recycle Gas Furnace: F-401, 200 MMBtu/Hr
S-24 Cat Feed Hydrofiner Treat Gas Furnace: F-601, 33 MMBtu/Hr
S-25 Fluid Catalytic Cracker Unit: F-701, 230 MMBtu/Hr
S-26 Cat Naphtha Hydrofiner Furnace: F-801, 33 MMBtu/Hr
S-30 – S-33 Powerformer Furnace: F-2901 thru 2904, 463 MMBtu/Hr
S-34 Powerformer Regenerator Furnace: F-2905, 74 MMBtu/Hr
S-35 Powerformer Reactivation Furnace: F-2906, 14 MMBtu/Hr
S-40 Utility Package Boiler: SG-2301, 218 MMBtu/Hr
S-41 Utility Package Boiler: SG-2301, 218 MMBtu/Hr
S-173 Coker Steam Superheat Furnace: F-902, 20 MMBtu/Hr
S-220 MRU Hot Oil Furnace: F-4460, 351 MMBtu/Hr

Valero Asphalt Plant (Plant # B3193)

S-19 Vacuum Heater: H-1, 40 MMBtu/Hr (from 33 MMBtu/Hr 4/03, AN 7023)
S-20 Steam Boiler: H-2A, 15 MMBtu/Hr
S-21 Steam Boiler: H-2B, 15 MMBtu/Hr

The maximum fired duty specified above for each combustion source in the ACP is redundant and unnecessary. Table IIA – Permitted Sources in the Title V permits for both the fuels refinery (Plant #B2626) and the asphalt plant (Plant #B3193) already include enforceable limits for maximum hourly firing rates for all combustion sources included in the ACP. It is more efficient to reference the fired duty limits in Table IIA rather than restating the same limits in this permit condition, so that any future changes can be made in one place in the Title V permit.

*2. The applicant shall submit quarterly reports and an annual report (July 1 to June 30) of their ACP activity no later than 30 days after the close of the specified period. (Basis: Regulation 2-9-303.3)

Condition# 19329

For Sources S19, Vacuum Heater; S20, S21, Steam Boilers

Delete redundant title.

*3. The applicant shall submit all necessary documents to the District to review and approve (or deny) the Alternative Compliance Plan. These documents in support of continuing the ACP shall be submitted no later than 30 days after the close of the calendar year. (Basis: Regulation 2-9-303.3)

*4. The applicant shall maintain all records required in parts #2 and #3 for a period of at least 5 years from the date of such record. These records shall be made available to District staff upon request. (Basis: Regulation 2-9-303.3)

Condition# 20617**For Sources S19, Vacuum Heater; S20, S21, Steam Boilers****Regulation 9, Rule 10 Refinery-Wide Compliance**

*1a. The following *asphalt plant* sources are subject to the refinery-wide NOx emission rate and CO concentration limits in Regulation 9, Rule 10, except that compliance with the facility's NOx ACP pursuant to Regulation 2, Rule 9 and Condition 19329 is considered compliance with the NOx refinery-wide standard in Regulation 9-10-301. The maximum hourly firing rates for the sources listed below are shown in Table IIA – Permitted Sources; the maximum NOx emission factor, and the maximum CO concentration are shown below.

S#	description	max firing rate		NOx	CO
		MMbtu/hr	lb/MMbtu	ppmv @ 3% O2	
19	Vacuum Heater	40	0.030	< 200	
20	Steam Boiler-5		0.055	< 400	
21	Steam Boiler-5		0.055	< 400	

(9-10-301 & 9-10-305)

The maximum fired duty specified above for each combustion source in the ACP is redundant and unnecessary. Table IIA – Permitted Sources already includes enforceable limits for maximum hourly firing rates for combustion sources included in the ACP.

If the District requires the above information for the Title V permit, the CO limit for S-19 should be changed to 400 ppmv, dry @ 3% O2, operating-day average, consistent with Regulation 9-10-305.

1b. Compliance with the refinery-wide average NOx limit, 0.033 lb NOx/MMbtu fired, operating-day average, shall be achieved through the use of an approved Alternate Compliance Plan using NOx IERC's in accordance with Regulation 2 Rule 9 and Condition 19329.

The added paragraph further clarifies that NOx IERC's approved under the Alternate Compliance Plan provisions of Regulation 2 Rule 9 are an integral part of compliance for meeting the refinery-wide average NOx limit under Regulation 9 Rule 10.

2. The owner/operator of each source shall properly install and properly operate a fuel gas flowmeter and recorder and an O2 monitor and recorder. (9-10-502) An in-stack NOx, CO and O2 CEM or equivalent verification system (as defined by the 4/10/03 revision to the 6/23/00 NOx, CO and O2 Monitoring Compliance with Regulation 9 Rule 10 policy) shall be required for each source included in the Alternate Compliance Plan (9-10-502.1).

The proposed permit condition requiring a fuel gas flow meter should be deleted, because it is redundant with the monitoring requirements in Regulation 9-10-502, which is already listed as an applicable requirement. The proposed replacement permit condition specifies acceptable monitoring options as either a CEM or equivalent verification system.

3. The owner/operator of each source shall determine compliance with Regulation 9, Rule 10 as follows:

- A. Calculate NOx emissions from ~~the furnace~~ each combustion source using measured fuel gas rates, fuel gas heating values, and either NOx CEM data or NOx emission factors from ~~Part 1~~ an equivalent verification system.
- B. During periods of inoperation, the owner/operator shall use the emission adjustment procedures in 9-10-301.2
- ~~C. The daily refinery-wide average emission rate shall be determined by adding the emissions of the sources above to the emissions of the sources in Facility B2626 listed in Condition #19329 and dividing by the total heat input of the above sources added to the total heat input of the sources in Facility B2626 listed in Condition #19329.~~
- C. The refinery-wide daily average NOx emission rate shall be determined by adding the NOx emissions from all combustion sources listed in Part 1 of Condition #19329, and dividing the total NOx emissions by the total heat input from these sources. If the refinery-wide daily average NOx emission rate exceeds 0.033 lb NOx/MMbtu fired, then compliance with the NOx emission standard shall be achieved by providing sufficient NOx IERC credits in accordance with the Alternate Compliance Plan. (9-10-502)

The proposed permit condition clarifies the methodology for calculating the refinery-wide daily average NOx emission rate, including the use of NOx IERC credits to comply with the emission standard.

4. NOx Box-Operation

The owner/operator shall operate S19, which is currently not equipped with a NOx and O2 CEM, within a specified range of operating conditions (firing rate and oxygen content). The range shall be established by conducting district approved source tests. (9-10-502)

Clarifies that S-19 is currently not equipped with a NOx and O2 CEM.

5. NOx Box-Establishment

The owner/operator shall establish the initial NOx box for S19 by ~~4/10/03~~ 1/01/04. The procedure for establishing the initial NOx box is:

- A. Conduct district approved source tests for NOx, ~~and~~ CO, and O2 while varying the oxygen concentration and firing rate over the desired operating range for the furnace;

- B. Determine the minimum and maximum oxygen concentrations and firing rates for the desired operating range (~~Note that the minimum O2 at low-fire may be different than the minimum O2 at high-fire. The same is true for the maximum O2~~);
- C. Determine the highest NOx emission factor (lb/MMbtu) over the entire operating range while maintaining CO concentration below 200 ppmv, dry, at 3% O2, based on an operating-day average; the owner/operator may choose to use a higher NOx emission factor. If the new factor is ~~different~~ higher than the current factor in part 1 above in the ACP, the emission factor shall be revised increased using the minor revision procedures in Regulation 2, Rule 6 an accelerated permit application to request an administrative change to the permit condition.
- D. Plot the following points on a graph and connect the 4 points with straight lines. The resulting polygon is the NOx Box, which represents the allowable operating range for the furnace under which the NOx emission factor from part 5C is deemed to be valid:
- i. Min. O2 at low-fire
 - ii. Max. O2 at low-fire
 - iii. Min. O2 at high-fire; and
 - iv. Max. O2 at high-fire

(9-10-502)

See WSPA comments and rationale (Attachment E) regarding extending the deadline to properly implement the new NOx permit conditions.

The November 10, 2003 deadline for establishing an initial NOx box under the new NOx box policy is too tight. A January 1, 2004 deadline is more realistic, and provides an efficient transition date from the old to the new NOx box policy for monitoring, recordkeeping, and reporting.

The operating-day average for 200 ppm CO is consistent with the operating-day average set forth in Regulation 9-10-305.

An accelerated permit application is appropriate for requesting an administrative change to a NOx emission factor, because compliance with the refinery-wide NOx emission limit is always maintained by using sufficient NOx IERC credits.

6. NOx Box-limits

- A. Except as provided in part 6B, the owner/operator shall operate S19 within the established NOx Box at all times of operation.
- B. The owner/operator may deviate from the established NOx Box up to a maximum of ~~20% from the established NOx Box~~ (either the firing rate or oxygen limit) provided that the owner/operator conducts a district approved source test within 45 days of the deviation to demonstrate that whether the deviation complies with the NOx emission factor. The source test results shall be submitted to the district source test manager within 30 45 days of the test. Any deviation beyond the established NOx Box shall require notification to the Enforcement Division within 96 hours of the deviation. *The owner/operator shall not be cited for exceeding the current NOx emission limit or rate, or operating outside of the established NOx box, since compliance with Regulation 9-10-301 is maintained by using NOx IERC credits.*

~~In order to establish the 20% deviation, each corner shall be adjusted by 20% for both firing rate and oxygen limit. Connecting these points should create another box that will have parallel lines to the original box. This box represents the allowable 20% deviation. Again, any operation beyond the 20% deviation box is a violation of Regulation 9-10-502.~~

See WSPA comments and rationale (Attachment E) on deletion of the proposed 20% deviation standard outside of the NOx box, and additional time needed to submit source test results to the District. Since there is no possibility for Valero to exceed the daily refinery-wide average NOx emission standard by providing sufficient NOx IERC credits in the ACP, there is no reason to cite Benicia for operating outside of the established NOx box and/or exceeding the current NOx emission factor. However, Valero recognizes the importance of expeditiously updating its NOx emission factors and/or NOx box parameters to facilitate monitoring and compliance.

1. ~~If the results of this source test exceed the permitted emission concentrations or emission rates by more than 20%, the unit will be considered to have been in violation of both Regulations 9-10-502 and 2-1-307 for each day it operated outside of the defined operating range the higher emission factor shall be retroactively applied from the date of the previous source test and sufficient NOx IERC's provided for that time period to maintain compliance with the refinery-wide daily average NOx limit in Regulation 9-10-301. The owner/operator shall use the measured NOx emission factor to determine compliance with Regulation 9, Rule 10 for each affected time period.~~ In this situation, the facility may submit an accelerated permit application to request an ~~modification~~ administrative change of the permit condition to change the NOx emission factor and/or adjust the operating range, based on the new test data.
2. ~~If the results of this source test do not exceed permitted emission concentrations or rates by more than 20%, no retroactive adjustment of NOx emissions and/or use of NOx IERC credits based on the most recent source test results is required. the unit will not be considered to be in violation during this period for operating out of the "box." The owner/operator may submit an accelerated permit application for an administrative change to increase the allowable operating range, based on the new test data.~~

~~3. THE OWNER/OPERATOR SHALL NOT EXCEED 20% FOR ANY DEVIATION OF EITHER O₂ OR FIRING RATE. ANY DEVIATION BEYOND 20% WILL BE CONSIDERED A VIOLATION OF REGULATION 9-10-502 REGARDLESS OF WHETHER THE DEVIATION IS LATER DETERMINED TO BE IN COMPLIANCE WITH THE ORIGINAL NO_x EMISSION FACTOR.~~

See WSPA comments and rationale (Attachment E) for proposed permit conditions, which are similar to the 20% allowance given to CEM accuracy standards. In Valero's case, retroactive adjustment of NO_x emissions and NO_x IERC credits is justified to ensure compliance with the refinery-wide NO_x emission standard, if source test results exceed the permitted emission concentrations or rates by more than 20%.

C. Part 6 does not apply to low firing rate conditions during startup or shutdown periods or periods of curtailed operations lasting less than 3 days.

See WSPA comments and rationale (Attachment E) regarding low firing rate conditions during periods of curtailed operations resulting from operational upsets.

D. Part 6 does not apply during any source test required or permitted by this condition. (9-10-502)

7. The owner/operator shall conduct at least two district approved NO_x, CO, and O₂ source tests at S19 per consecutive 12 month period in order to measure NO_x, CO, and O₂ at the as-found firing rate, within 20% of the permitted O₂ conditions likely to maximize NO_x emissions. The time interval between source tests shall not exceed 8 months and not be less than 5 months apart. The source test results shall be submitted to the district source test manager within 30 45 days of the test. (9-10-502)

If the results of a source test under this Part 7 exceed the permitted emission concentrations or rates by more than 20%, the source shall then be subject to the provisions of Part 6.B.1. If the results of a source test under this Part 7 do not exceed the permitted emission concentrations by more than 20%, the source shall then be subject to the provisions of Part 6.B.2.

The added paragraph defines the outcome of a high source test result within the established NO_x box, consistent with the outcome of high source test results outside of the NO_x box, as described in Part 6.B.

8. The owner/operator shall conduct two additional semi-annual district approved NOx, CO, and O2 source tests at S19 at conditions likely to maximize CO at the as-found firing rate, for units that the initial test results or any semi-annual test results of the unit during the past five consecutive year period, are greater than or equal to 200 ppmv CO at 3% O2, operating-day average. The source test results shall be submitted to the district source test manager within 30 45 days of the test. (9-10-502)

The operating-day average for 200 ppm CO is consistent with the operating-day average set forth in Regulation 9-10-305.

9. If any two source test results at S19 over any consecutive five year period are greater than or equal to 200 ppmv CO at 3% O2, operating-day average, the owner/operator shall properly install and properly operate a CEM to continuously measure CO and O2. The owner/operator shall install the CEM within the time period allowed in the District's Manual of Procedures. (9-10-502)

The operating-day average for 200 ppm CO is consistent with the operating-day average set forth in Regulation 9-10-305.

10. If the owner/operator receives any two violation notices per source relating to NOx emissions any two source test results conducted under Part 6.B at S-19 over any consecutive five-year period exceed the permitted NOx emission concentration or rate by more than 20%, the owner/operator shall properly install and properly operate CEM to continuously measure NOx and O2. The owner/operator shall install the CEM within the time period allowed in the District's Manual of Procedures. (9-10-502)

Violation notices related to NOx emissions cannot be issued at Valero, because NOx IERC credits will always be used for compliance with the refinery-wide NOx emission standard. However, Valero recognizes the importance of diligently adhering to the spirit of the equivalent verification system, and the consequences of not operating within the guidelines, resulting in mandatory installation of a NOx CEM.

11. The owner/operator of S19 shall maintain hourly daily records of all fuel usage, the higher heat content of the fuel, O2 levels, and all source test data in order to demonstrate compliance with Parts numbers 1 and 12-the ACP, and Regulation 9, Rule 10. These records shall be kept on site for at least five years from the date of entry in a District approved log and be made available to District staff upon request. (9-10-502)

Daily average records are consistent with the daily refinery-wide average NOx emission standard.

12. NOx Box-Operating Parameters for S-19 (to be established by 11/10/03)

These parameters are shall be based on no more than a one-hour calendar-day averaging period for both firing rate and O2.

source #19: 1) low O2/high fire 2) high O2/high fire

3) low O2/low fire 4) high O2/low fire

(9-10-502)

The daily average NOx box parameters are consistent with the daily refinery-wide average NOx emission standard.

13. The owner/operator shall conduct one district approved NOx, CO, and O2 source test at S20 and S21 each per consecutive 12 month period in order to measure NOx, CO, and O2. *If the results of any S-20 or S-21 source test exceed the permitted concentrations or rates by more than 20%, the higher emission factor shall be retroactively applied from the date of the previous source test, and sufficient NOx IERC's provided for that time period to maintain compliance with the refinery-wide daily average NOx limit in Regulation 9-10-301. In this situation, the facility may submit an accelerated permit application to request an administrative change of the permit condition to change the NOx emission factor, based on the new test data. Any exceedance of the emissions allowed by part 1 shall be considered a violation of Regulation 9-10-502 and 2-1-307.* The owner/operator shall conduct the sources tests at conditions representative of normal operations. The time interval between source tests shall not exceed 13 months and not be less than 10 months apart. The source test results shall be submitted to the district source test manager within 30 45 days of the test.

(9-10-502)

Consistent with proposed Parts 6.B and 7, Valero will retroactively calculate NOx emissions and provide sufficient NOx IERC credits, based on the most recent source test results which exceed the permitted NOx concentrations or rates by more than 20%.

Attachment G

New Permit Shields for Subsumed Requirements, Tables IX-B3 through IX-B13

Table IX B - 3
Permit Shield for Subsumed Requirements
REFINERY-WIDE

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-5-603.2 (8-5-328.1.2)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 to measure emissions of organic compounds to verify 90% control efficiency of Approved Emission Control System for tank degassing as required in BAAQMD 8-5-328.1.2.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 4
Permit Shield for Subsumed Requirements
S5, S6, S7, S8 ASPHALT STORAGE TANKS
S37, S38 RUBBERIZED ASPHALT SALES TANKS
S51, S52, S53 SALES TANKS – ASPHALT LIQUID
S54 ASPHALT LOADING RACK
S60 ASPHALT TANK, TK-505
S61, S62 ASPHALT STORAGE TANKS
S65 ASPHALT STORAGE TANK
S70 ASPHALT ADDITIVE MIXING TANK

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 6-601 (6-301)	Use the BAAQMD Manual of Procedures, Volume I, Evaluation of Visible Emissions to evaluate Ringelmann #1 limit in BAAQMD 6-301	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 6-601 (6-310)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-15, Particulate Sampling to determine compliance with the Particulate Weight Limitation in BAAQMD 6-310	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 5
Permit Shield for Subsumed Requirements
S13 KEROSENE TANK #8
S59 GAS OIL TANK #5
S63 TANK 31

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-5-603.1 (8-5-306)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-4 to measure emissions of organic compounds to verify 95% control efficiency of Approved Emission Control System required in BAAQMD 8-5-306. NOTE: ST-4 has been deleted in the MOP without replacement.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
40 CFR 60 Subpart Kb 60.113b(c)(1) and 60.113b(c)(2) [60.112b(a)(3)(ii)]	Submit an operating plan with documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions to verify 95% control efficiency of closed vent system and control device required in 40 CFR 60 Subpart Kb 60.112b(a)(3)(ii).	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 6
Permit Shield for Subsumed Requirements
S14 TRUCK LOADING RACKS, NAPHTHA
S15 TRUCK LOADING RACKS, GAS OIL

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-6-601 (8-6-301)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-3 or ST-34 to verify compliance with the Bulk Terminal Limitations of BAAQMD 8-6-301.	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 7
Permit Shield for Subsumed Requirements
S17 TRUCK LOADING RACKS - ASPHALT

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 6-601 (6-301)	Use the BAAQMD Manual of Procedures, Volume I, Evaluation of Visible Emissions to evaluate Ringelmann #1 limit in BAAQMD 6-301	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 6-601 (6-310)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-15, Particulate Sampling to determine compliance with the Particulate Weight Limitation in BAAQMD 6-310	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 8
Permit Shield for Subsumed Requirements
S24 HOT OIL HEATER
A31 THERMAL OXIDIZER

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 6-601 (6-301)	Use the BAAQMD Manual of Procedures, Volume I, Evaluation of Visible Emissions to evaluate Ringelmann #1 limit in BAAQMD 6-301	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 6-601 (6-310 for A31 only) (6-310.3 for S24 only)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-15, Particulate Sampling to determine compliance with the Particulate Weight Limitation in BAAQMD 6-310	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 8-5-603.1 (8-5-306)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-4 to measure emissions of organic compounds to verify 95% control efficiency of Approved Emission Control System required in BAAQMD 8-5-306. NOTE: ST-4 has been deleted in the MOP without replacement.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 8
Permit Shield for Subsumed Requirements
S24 HOT OIL HEATER
A31 THERMAL OXIDIZER

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-5-603.2 (8-5-328.1.2)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 to measure emissions of organic compounds to verify 90% control efficiency of Approved Emission Control System for tank degassing as required in BAAQMD 8-5-328.1.2.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 8-6-601 (8-6-301)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-3 or ST-34 to verify compliance with the Bulk Terminal Limitations of BAAQMD 8-6-301.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 8-8-602 (8-8-301.3)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A to determine emissions of precursor organic compounds to verify 95% control efficiency of the Oil-Water Separator vapor recovery system as specified in 8-8-301.3.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 8
Permit Shield for Subsumed Requirements
S24 HOT OIL HEATER
A31 THERMAL OXIDIZER

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-8-602 (8-8-307.2)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A to determine emissions of precursor organic compounds to verify 70% control efficiency of the Air Flotation Unit vapor recovery system as specified in 8-8-307.2.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
40 CFR 60 Subpart Kb 60.113b(c)(1) and 60.113b(c)(2) [60.112b(a)(3)(ii)]	Submit an operating plan with documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions to verify 95% control efficiency of closed vent system and control device required in 40 CFR 60 Subpart Kb 60.112b(a)(3)(ii).	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 9
Permit Shield for Subsumed Requirements
S27 RECOVERED OIL TANK TK-12A, ABATED BY CARBON OR THERMAL OXIDIZER
OR PROCESS HEATER
S67 RECOVERED OIL TANK

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-5-603.1 (8-5-306)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-4 to measure emissions of organic compounds to verify 95% control efficiency of Approved Emission Control System required in BAAQMD 8-5-306. NOTE: ST-4 has been deleted in MOP without replacement.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 10
Permit Shield for Subsumed Requirements
S31, RAILCAR GAS OIL AND ASPHALT LOADING RACK

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 6-601 (6-301)	Use the BAAQMD Manual of Procedures, Volume I, Evaluation of Visible Emissions to evaluate Ringelmann #1 limit in BAAQMD 6-301 for abated sources	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 6-601 (6-310)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-15, Particulate Sampling to determine compliance with the Particulate Weight Limitation in BAAQMD 6-310 for abated sources	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 8-6-601 (8-6-301)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-3 or ST-34 to verify compliance with the Bulk Terminal Limitations of BAAQMD 8-6-301.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 11
Permit Shield for Subsumed Requirements
S41 WEMCO HYDROTREATER

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-8-602 (8-8-307.2)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A to determine emissions of precursor organic compounds to verify 70% control efficiency of the Air Flotation Unit vapor recovery system as specified in 8-8-307.2.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Table IX B - 12
Permit Shield for Subsumed Requirements
S66 OIL WATER SEPARATOR

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 8-8-602 (8-8-301.3)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A to determine emissions of precursor organic compounds to verify 95% control efficiency of the Oil-Water Separator vapor recovery system as specified in 8-8-301.3.	BAAQMD Condition #1240, Part II.58b	Continuous temperature monitoring based on initial source test to determine the minimum temperature at which S24 and A31 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

Attachment G - New Permit Shields for Subsumed Requirements,
Tables IX-B3 through IX-B13 (continued)

Table IX B - 13
Permit Shield for Subsumed Requirements
A4 THERMAL OXIDIZER

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
BAAQMD 6-601 (6-301)	Use the BAAQMD Manual of Procedures, Volume I, Evaluation of Visible Emissions to evaluate Ringelmann #1 limit in BAAQMD 6-301	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 6-601 (6-310)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-15, Particulate Sampling to determine compliance with the Particulate Weight Limitation in BAAQMD 6-310	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.
BAAQMD 8-6-601 (8-6-301)	Source tests per BAAQMD Manual of Procedures, Volume IV, ST-3 or ST-34 to verify compliance with the Bulk Terminal Limitations of BAAQMD 8-6-301.	BAAQMD Condition #1240, Part I.19	Continuous temperature monitoring based on initial source test to determine the minimum temperature at A4 must operate to maintain compliance with the requirement for 98.5% destruction efficiency, the grain loading limit in BAAQMD 6-310, and other standards.

List of Attachments

<u>Attachment</u>	<u>Title</u>
A	Comments on Sections II, III, IV, VI, VIII, and IX
B	Comments on Section VII
C	Modifications to Table IIB – Abatement Device
D	Modifications to Table IV-A for 40 CFR 63 Subpart A
E	WSPA Comments - Proposed Refinery NOx Box Permit Conditions
F	Valero Comments - Proposed Asphalt Plant NOx Box Permit Conditions
G	New Permit Shields for Subsumed Requirements, Tables IX-B3 through IX-B13